

30 JUN 1989

5HR-12

Robert Hukill, President  
Hukill Chemical Company  
7013 Krick Road  
Bedford, Ohio 44146-4493

Re: Return to Compliance  
Hukill Chemical Company  
OHD 001 926 740

Dear Mr. Hukill:

We have received and reviewed your letter of June 22, 1989, regarding our Notice of Violation (NOV) dated May 22, 1989.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulations found at 40 CFR 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV. We would like to point out, however, that the California List prohibition relating to halogenated organic compounds (HOCs) in your sample notification is incorrect. It should, in effect, read hazardous wastes containing HOCs in total concentration greater than or equal to 1,000 mg/l (liquids) or 1,000 mg/kg (nonliquids).

If you should have any further questions, please contact Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Mike Savage, OEPA  
Paul Anderson, OEPA-NEDO

bcc: Sally Swanson, REB

5HR-12:R. BROWN:or:3-7925:06/28/89:DISK#2:FILENAME:RHukill

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	REB 6-29-89	<i>[Signature]</i> 6/29/89	

22 MAY 1989

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Hukill, President  
Hukill Chemical Company  
7013 Krick Road  
Bedford, Ohio 44146

Re: Notice of Violation  
Hukill Chemical Company  
OHD 001 926 740

Dear Mr. Hukill:

On November 23, 1988, the Ohio Environmental Protection Agency, representing the United States Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California List wastes which became effective on July 8, 1987. Additionally, land disposal restrictions for the First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth at 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

1. The facility did not determine if the wastes exceed applicable California List prohibition levels. 40 CFR Part 268.7 requires generators of land disposal restricted wastes to determine by testing, or by knowledge of the wastes, whether such wastes exceed applicable treatment standards and California List prohibition levels. If knowledge of the waste is used, all supporting data used to make this determination must be maintained in your files.
2. The facility was shipping California List wastes to treatment facilities without attendant or complete notifications, as required under 40 CFR Part 268.7. Under Part 268.7(a)(1), generators who manage restricted wastes which exceed treatment standard or prohibition levels are required to provide a

notification for each shipment of wastes to a treatment facility. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard or prohibition level; manifest number; and waste analysis data, where available. The notification must be supplied to the treatment facility as a separate document accompanying the manifest. Please include in your response to this Notice of Violation, an example of the notification you will supply to the treatment facility.

3. The facility did not revise its waste analysis plan to meet the requirements of 40 CFR Part 265.13. Waste analysis plans must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of 40 CFR Parts 265.13 and 268. Please provide this office with a copy of your revised analysis plan addressing the requirements of 40 CFR Part 268.
4. The facility stored restricted waste for more than one year. In accordance with 40 CFR Part 268.50(a), storage of restricted wastes is prohibited unless necessary to facilitate proper recovery, treatment, or disposal. 40 CFR Part 268.50(c) also places the burden of proof for storage of restricted wastes for more than one year on the owner/operator of a treatment, storage, or disposal facility.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

Please direct your response or any questions you may have regarding this letter to Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA  
Paul Anderson, NEDO

bcc: Sally Swanson, REB

*O.R.*  
*5/16/89*

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	<i>REB</i> <i>5-16-89</i>	<i>P.E.N.</i> <i>5-18-89</i>	

5HR-12:R. BROWN:or:05/11/89:DISK #2:PC FILENAME:Hukill

# HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400

Over Forty Years of Quality Products and Services

May 4, 1989

Mr. Paul Anderson,  
Environmental Scientist  
Ohio EPA  
Northeast District Office  
2110 E. Aurora Road  
Twinsburg, OH 44087-1969

RECEIVED  
MAY 08 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Re: Response to 3/21/89 HW Storage Tank Inspection Report  
OHIO Permit 02-18-0315  
USEPA ID OHD001926740

Dear Mr. Anderson:

This is the response to your list of violations noted during your March 21, 1989, inspection of the Hukill Chemical Corporation facility's hazardous waste storage tanks as found in your April 4, 1989 memo. We have responded in the same order as the violations appear on your list.

1. The written integrity assessment report for the six tanks and the new V-720 hazardous waste storage tanks is being prepared by Eder and Associates. It will be sent to you under separate cover. V-720 tank is the replacement tank for the V-714 tank for which we have submitted a Partial Closure Plan. A copy of the Partial Closure Plan has been sent to your attention.
- 2.a. The new concrete dike containing the seven hazardous waste storage tanks has been partially caulked with a polysulfide material to seal the concrete joints. We are screening protective coatings for the concrete that will provide an impermeable seal over the concrete walls and floor of the dike.

When a satisfactory coating is found, the remaining hazardous waste storage tank dikes will be sealed. We expect to have all these dikes sealed this spring and summer. In the event of a spill in a HW storage tank dike, we will make every effort to clean it up immediately to minimize the exposure to the uncoated concrete.



Mr. Paul Anderson, Environmental Scientist

OHIO EPA, N.E. District Office

Response to 3/21/89 HW Storage Tank Inspection Report

- 2.b. The four 90 day storage tanks will be relocated. The 4,000 gallon and 1,500 gallon tanks have been placed inside the new HW storage tank dike. The two 750 gallon tanks will be moved to inside the diked Processing Area.
- 2.c. Herron Testing has complete the annual testing for wall thickness on all the HW storage tanks including the new V-720, the replacement for V-714. This was completed the week of April 24, 1989. Herron will provide a written report to us.

Additional Corrective Action:

1. We have submitted a Partial Closure Plan for the V-714 HW storage tank and the HW Solidification Blender with a copy to you, dated May 1, 1989. We will complete closure of them when we have approval of the Partial Closure Plan.

EDER and Associates is preparing the Corrective Action Plan which will address the partial closure of the area in which the permitted hazardous waste storage tanks were previously located.

2. The request for our permit revision for the new hazardous waste tank farm was submitted to Dr. Richard Shank, Director, Ohio EPA, on March 31, 1989. A copy of this request was sent to your attention.

Thank you for your assistance in preparing our Partial Closure Plan and in trying to find a coating for the HW Storage Tank dikes that will withstand the solvents we handle.

Please contact Ed Price or me if you have any questions regarding the above.

Very truly yours,

HUKILL CHEMICAL CORPORATION



Robert L. Hukill  
President

RLH:dk

cc: Ms. Francine Norling, U.S. EPA - Region V  
Mr. Ken Bardo, U.S. EPA - Region V  
Mr. Nick Andrianas, EDER & Associates



State of Ohio Environmental Protection Agency

Northeast District Office

1110 E. Aurora Road  
Twinsburg, Ohio 44087-1969  
(216) 425-9171

RECEIVED  
APR 10 1989

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V



Richard F. Celeste  
Governor

April 4, 1989

RE: HUKILL CHEMICAL CORP.  
CUYAHOGA COUNTY  
02-18-0315  
OHD 001-926-740  
G-T-TSDF

Robert Hukill  
Hukill Chemical Corp.  
7013 Krick Road  
Bedford, Ohio 44146

Dear Mr. Hukill:

On March 21, 1989, I met with you and Ed Price to conduct an inspection of the hazardous waste storage tanks at your facility. The purpose of the inspection was to assess your facility's compliance with the new tank standards which became effective in Ohio in December of 1988.

The following violations were noted during the inspection:

1. The facility has failed to obtain a written integrity assessment for the 6,200 gallon and 10,000 gallon hazardous waste fuel blending tanks and the four tanks used to store hazardous wastes for periods less than 90 days (two 750 gallon, a 1,500 gallon and a 4,000 gallon tank) as required by OAC 3745-66-91 and 40 CFR 265.191.
2. Secondary containment which meets the standards specified in OAC 3745-66-93 and 40 CFR 265.193 has not been installed by January 12, 1989 for any of the hazardous waste tanks at the facility as required. Secondary containment for the tanks must be installed as specified below:
  - a. For the hazardous waste storage tanks found in diked concrete lined areas (the spent acid tank, tanks V114, V214, V314, V414, V514, V614, V714, and V117, the east and west feed tanks, and the 6,200 gallon and 10,000 gallon hazardous waste fuel blend tanks), the concrete liners and dikes must be coated with a material which will prevent migration of waste constituents into the concrete and with chemical resistant water stops at all joints as required by OAC 3745-66-93 (E)(2)(b) and 265.93 (e)(2).
  - b. For the four remaining less than 90 day storage tanks, a dike, trench, liner or vault capable of providing secondary containment and meeting the standards of OAC 3745-66-93 and 40 CFR 265.193 must be constructed.
  - c. A leak test of the hazardous waste tanks at the facility has not been conducted annually as required by OAC 3745-66-93 (I)(2) and 40 CFR 265.193 (i)(2).

Mr. Robert Hukill  
Hukill Chemical Corp.  
April 4, 1989  
Page -2-

In addition to addressing the violations noted above, action must also be taken regarding the following issues:

1. A partial closure plan must be filed for the area in which the permitted hazardous waste storage tanks were formally operated and for the hazardous waste solidification unit which is no longer in use. The closure plan must ensure that the closure performance standard set in OAC 3745-66-11 (40 CFR 265.111) is met and must comply with the content requirements of OAC 3745.66.12 (40 CFR 265.112). The closure plan for the former tank farm area must describe how closure will be coordinated with the RCRA corrective action currently in progress at the facility.
2. A permit change request must be filed with the Director of the Ohio EPA for the new hazardous waste tank farm in accordance with OAC 3745-50-51. In addition, U.S. EPA must be notified of the changes made under interim status as required by 40 CFR 270.72.

I have enclosed a copy of my inspection checksheet and the Ohio EPA closure plan review guidance document for your use. Three copies of the closure plan must be submitted within thirty days to:

Thomas Crepeau  
Program Planning and Management Section  
Division of Solid and Hazardous Waste Management  
Ohio EPA  
P. O. Box 1049  
Columbus, Ohio 43266-1049

Please submit documentation of measures you have taken to correct the violations noted during my inspection to my attention within thirty days of receipt of this letter.

If you should have any questions, please feel free to call me.

Sincerely,



Paul Anderson  
Environmental Scientist  
Division of Solid and Hazardous Waste  
Management

cc: Debby Berg, DSHWM, NEDO  
Dave Sholtis, DSHWM, Central Office  
Francine Norling, U.S. EPA - Region V  
Ken Bardo, U.S. EPA - Region V

PA/sp

Enclosure





State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road

Twinsburg, Ohio 44087

(216) 425-9171

Richard F. Celeste  
Governor

December 7, 1988

RE: HUKILL CHEMICAL CORP.  
CUYAHOGA COUNTY  
OHD 001-926-740  
#02-18-0315  
G-T-TSDF

Mr. Robert Hukill  
Hukill Chemical Corp.  
7013 Krick Road  
Bedford, Ohio 44146

Dear Mr. Hukill:

Thank you for the courtesy extended to Kevin Bonzo and me during our November 23, 1988 inspection. You represented the facility during the inspection.

No violations were noted during my inspection. However, two items were noted which I believe merit your attention. First, you indicated that some shipments of waste materials to Ross Incineration Services have exceeded the Land Disposal Restriction treatment standards for metals. The metals are believed to have originated from paint wastes managed at your facility. I am concerned that your facility may be unknowingly accepting heavy metal contaminated waste solvents which could exceed E.P. Toxicity threshold values or the 40 CFR Part 268 treatment standards for total metals. Since your facility is not permitted for the acceptance of wastes which exceed E.P. Toxicity limits for metals, it appears that there may be a potential for permit violations should you unknowingly accept these wastes due to incomplete waste characterization by the generators you service. I am requesting that you evaluate your waste analysis plan and make any necessary changes which enables your facility to ensure that such violations of the permit limitations will not occur.

Secondly, your facility currently operates six (6) storage tanks which are used to blend hazardous waste fuels. These tanks are managed as less than 90 day storage tanks according to the requirements of OAC 3745-52-34 and 40 CFR 262.34. However, your submittal to U.S. EPA dated May 1988 of tank integrity assessments include only assessments for the permitted tanks at the facility. It thus appears that you may not be in full compliance for the federal tank integrity assessment requirements since they are applicable to both permitted and temporary storage tanks. I suggest that you contact U.S. EPA as soon as possible to resolve this matter.

During my inspection, a Land Disposal Restriction Inspection checklist was completed. This form will be forwarded to U.S. EPA for their review and action.

Hukill Chemical Corop.  
December 7, 1988  
Page -2-

I have included a copy of both inspection checksheets for your use. If you should wish to discuss any of these matters further, please feel free to contact me.

Sincerely,



Paul Anderson  
Environmental Scientist  
Division of Solid and Hazardous Waste  
Management

PA/sp

Enclosures

cc: Debby Berg, DSHWM, NEDO  
✓ Dave Sholtis, DSHWM, Central Office



SEP 30 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert L. Hukill, President  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146-4493

Re: Tank System Regulations  
Hukill Chemical Corporation  
OHD 001 926 740

Dear Mr. Hukill:

Regulatory amendments published July 14, 1986, and effective January 12, 1987, resulted in additional requirements for tank systems storing or treating hazardous waste (40 CFR 265.190 through 265.201). One of these additional requirements provides for secondary containment to prevent the release of hazardous waste and/or hazardous constituents to the environment. Secondary containment must be provided by January 12, 1989, pursuant to 40 CFR 265.193.

A draft conceptualized plan for phased construction of a new solvent tank farm with secondary containment was first presented to the United States Environmental Protection Agency (U.S. EPA) during a July 28, 1988, meeting in Chicago. Neither a final plan nor a closure plan for the old tank farm have been received by U.S. EPA or the Ohio Environmental Protection Agency. A risk assessment of soil contamination detected north of the existing tank farm and site of the proposed tank farm has also not been submitted.

Upgrading of the Hukill Chemical solvent tank farm is essential in preventing further releases of hazardous wastes and/or hazardous constituents to soil, groundwater, and surface water. Site investigations conducted under Consent Agreement and Final Order, V-W-85-R-014, have delineated the nature and extent of contamination associated with past storage and disposal practices. This data should be used to supplement any additional work necessary to implement closure and new construction of the hazardous waste tank farm.

It is the U.S. EPA's position that closure of the existing tank system and installation of a new tank system with secondary containment must proceed in accordance with applicable regulations. Owners and operators of facilities subject to the secondary containment requirements were given at

least two years to bring their facilities into conformance with these regulations. Please note that facilities that fail to comply with these requirements may be subject to Federal enforcement action including financial penalties.

If you have any questions concerning this matter, please contact Ken Bardo of my staff at (312) 886-7566.

Sincerely yours,  
**ORIGINAL SIGNED BY**  
**WILLIAM E. MUNO**

William E. Muno, Chief  
RCRA Enforcement Branch

cc: Nicholas Andrianas  
Eder Associates  
85 Forest Avenue  
Locust Valley, NY 11560

Paul Anderson, OEPA - NEDO  
Michael Savage, OEPA - CO

- 3 -

bcc: Francine Norling, RPB - OH

5HR-12:KBARD0:sbowie:6-7566:9/20/88

SEP 14 1988

SHR-12

Mr. Robert L. Hukill  
President  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146-4493

Re: Return to Compliance  
Hukill Chemical Corporation  
OHO 001 926 740

Dear Mr. Hukill:

We have received and reviewed your letter of September 8, 1988, regarding our Notice of Violation (NOV) dated August 10, 1988.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our August 10, 1988, NOV.

If you should have any further questions, please contact Mr. Gordon Garcia of my staff at (312) 886-8097.

Sincerely yours,

Sally K. Swanson, Chief  
IR/RR/OR Enforcement Program Section

cc: Mike Savage, OEPA  
Paul Anderson, REDD

bcc: Sally Swanson, REN

SHR-12:G.GARCIA:LT:9/12/88:DISK #3 FORM

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SECY	SECT. CHIEF	HWEB CHIEF	WMD DIR
INIT. DATE	jer 9-13-88	25 9/14/88				SJS 9-13-88		

# HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400

*Over Forty Years of Quality Products and Services*

September 8, 1988

Mr. Gordon Garcia  
US EPA Region V  
IN/MN/OH Enforcement Section  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: 5HR-12

Re: Land Ban Violation  
Hukill Chemical Corporation  
OHD 001 926 740

Dear Mr. Garcia,


Attached are pages from our Waste Analysis Plan (Section C) that refers to the Landfill Ban Regulations in 40 CFR 268. This should satisfy the requirements of 40 CFR 265.13 also.

We have been observing the Land Ban requirements to notify TSDFs in writing of the restricted Hazardous Waste Material we were shipping according to the Land Ban Regulations.

I trust you will find these revisions to our plan to be satisfactory. If you have any questions, please give me a call 1-216-232-9400.

Sincerely yours,

HUKILL CHEMICAL CORPORATION

  
Robert L. Hukill  
President

RLH:pk  
Attachment

cc: Mike Savage, OEPA - Columbus, Ohio  
Paul Anderson, NEDO - Twinsburg, Ohio

RECEIVED  
SEP 9 1988  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V



compartments are sampled by draining material out of the compartment's bottom valve and sampling again in a glass bottle.

#### Plan Supplement for Land Disposal Restrictions

Hazardous wastes received by Hukill Chemical Corporation must have been declared hazardous by the generator. We must take representative samples and analyze them to verify that they are properly described on the manifest and to determine how they will be processed at our facilities.

If it is decided that the hazardous waste will not be processed for recovery of solvents but sent to a disposal facility, we must further determine if the waste contains any restricted hazardous wastes as described in 40 CFR Part 268.

#### If the Waste Is A Solid

If it is determined that the solid waste has sufficient fuel value to be incorporated into an H W Fuels Blend, it will be further processed with other materials to meet the H W Fuels Blend specifications. The final H W Fuels Blend analysis sheet should then have the restricted hazardous waste(s) identified. Identification will be based on our records of previous similar materials received from the customer, our own lab analysis, the customer's statement and pertinent customer waste analysis records. This information will be used to prepare the notification by us to the treatment facility s specified in 40 CFR Part 268.7, (a), (1). This notification, our form titled "NOTIFICATION OF HAZARDOUS WASTE RESTRICTED FROM LANDFILL," will be attached to the manifest for each load of H W Fuels Blend.

If the solid waste cannot be incorporated into a H W Fuels Blend, it will be sent to an approved disposal facility as hazardous waste. In the case where the volatile organic constituents are determined to be below 1%, the use of an approved landfill will be considered. First, the representative samples must be sent to an outside testing laboratory where the Toxicity Characteristic Leaching Procedure (TCLP), as outlined in 40 CFR, Appendix I to Part 268, will be used to determine the mobility of both organic and inorganic contaminants. The resulting waste extract will then be analyzed to determine whether any restricted wastes, as listed in 40 CFR Part 268.41, Subpart D, Table CCWE, are present. If restricted wastes are present, they must not exceed the levels listed in the above mentioned Table CCWE. The notification contains a certification which must be signed by an authorized representative of the Hukill Chemical Corporation. The notification also contains our EPA hazardous Waste Number and must contain the manifest number associated with the shipment of waste.

#### If The Waste Is A Liquid

The fuel value of the liquid waste will be determined. Then it will be further processed with other materials to meet the H W

Fuels Blend specifications. The final H W Fuels Blend analysis sheet should have the restricted hazardous waste(s) identified. Identification will be based on our records of previous similar materials received from the customer, our own lab analysis, the customer's statement and pertinent customer waste analysis records. This information will be used to prepare the notification by us to the treatment facility as specified in 40 CFR Part 268.7, (a), (1). This notification, our form titled "NOTIFICATION OF HAZARDOUS WASTE RESTRICTED FROM LANDFILL," will be attached to the manifest for each load of H W Fuels Blend.

10 AUG 1988

5MR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert Hukill  
President  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Re: Notice of Violation  
Hukill Chemical Corporation  
OHIO 001 926 740

Dear Mr. Hukill:

On December 8 and 9, 1987, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California list wastes which became effective on July 8, 1987. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

The facility did not revise its waste analysis plan to meet the requirements of 40 CFR Part 268, as required under 40 CFR Part 265.13. Waste analysis plans must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of 40 CFR Parts 265.13, and 268.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

Please direct your response or any questions you may have regarding this letter to Mr. Gordon Garcia of my staff at (312) 886-8097.

Sincerely yours,

Sally K. Swanson, Chief  
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA  
Paul Anderson, NED

bcc: Sally Swanson, REB

5HR-12:RCRA:G.GARCIA:lt:8/5/88:DISK#FORM

INIT. DATE	TYP.	AUTH	IL/MN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. SEC. CHIEF	O.R. A.D.D.	WMD DIR
8-10-88		8/19/88					als for SLS 8-9-88			





State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road  
Mansfield, Ohio 44887-1969  
(216) 425-9171

CE = 52-11,34; 55-15,54

N, LB, IS, ISS

not in  
list



Richard F. Celeste  
Governor

December 17, 1987

RE: HUKILL CHEMICAL CORP.  
CUYAHOGA COUNTY  
OHD 001-926-740  
#02-18-0315  
G-T-TSDF

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Attn: Robert Hukill:

On December 8 and 9, 1987, Kris Coder and I conducted a hazardous waste inspection of Hukill Chemical Corporation located at 7013 Krick Road, Bedford. The facility was inspected for compliance with both State and Federal Regulations for the handling of hazardous wastes. During the inspection, you represented the facility.

The following violations were noted during the inspection:

1. 40 CFR 262.11 and OAC 3745-52-11 require that your paint filters used in operations for painting hazardous waste containers be evaluated to determine whether or not they are hazardous waste as defined in 40 CFR Section 261.20 and OAC 3745-51-20. If so, these filters must be managed as hazardous waste and disposed of in a manner consistent with applicable rules contained in 40 CFR 262/265 and OAC 3745-52, -65, -66.
2. *labeling* Process feed tanks used to temporarily store hazardous waste (for periods less than 90 days) should be clearly marked with the words "hazardous waste" and an indication of the maximum residence time of the hazardous waste in the tank as required by 40 CFR 262.34 and OAC 3745-52-34.
3. The facility's written inspection logs must be revised to more effectively document any equipment malfunctions or problems found as well as the completion of remedial actions to rectify them in accordance with 40 CFR 265.15 and OAC 3745-65-15.
4. The facility's written contingency plan should be revised to: 45-54 *Amend of*
  - a. revise the list of names, home addresses and telephone numbers of persons currently qualified





State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road  
Twinsburg, Ohio 44087-1969  
(216) 425-9171



Richard F. Celeste  
Governor

September 14, 1987

RE: NPDES PERMIT NO. 3IF00036  
USEPA: OH0063444

047D 001 926 740

Mr. Robert Hukill  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Dear Mr. Hukill:

Enclosed is a copy of the Compliance Inspection Report for the inspection that was conducted at your plant on September 3, 1987. Hukill was found to be in compliance with the NPDES permit and associated Findings and Orders, issued 8/20/87, to rectify noncompliance with the above captioned permit.

During the inspection several concerns came to our attention and are discussed in the recommendation portion of the report. These concerns are summarized as follows:

- 1) The correct conversion factor is required in converting your phenolic lab data to the units of ug/l required in the DMR's. A description of previously reported phenolics data, believed to be in error, should be submitted to our office by October 30.
- 2) Hukill should definitely consider the replacement of the 1500 gallon tank with a larger one.
- 3) The impact of the western parking lot's storm drainage flow should be sampled to ascertain whether it impacts waters of the state. Results of this sampling should be submitted to our office by October 30.

Thank you for the courtesy and cooperation extended to Agency personnel during the survey. Should you have any questions or comments on the report, please contact Dan Powell.

Yours truly,

Dennis E. Lee, P.E.  
Group Leader  
Industrial Wastewater

DEL:mjo

Enclosure

cc: R.E. Phelps, IWW, CO



United States Environmental Protection Agency  
Washington, D. C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code 11N 251	NPDES 301H0101613141411	yr./mo./day 12/8/71	Inspection Type 18C	Inspector 19S	Fac Type 20Z
Remarks 101E1P1A1 INIPID1ETS1 1#31IF01013161*1B1D1					
Reserved 67	Facility Evaluation Rating 7d4	BI 71N	QA 72N	Reserved 73 74 75	80

## Section B: Facility Data

Name and Location of Facility Inspected Hukill Chemical Corporation 7013 Krick Road Bedford, OH 44146	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 9:00	Permit Effective Date 77-05-04
Names of On-Site Representative(s) Suzanne Prusnek Robert Hukill	Exit Time/Date 11:15 87-9-3	Permit Expiration Date 81-05-03
Name, Address of Responsible Official Robert Hukill	Title President	Phone No. 216-232-9400
		Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S Permit	S Flow Measurement	N Pretreatment	S Operations & Maintenance
S Records/Reports	S Laboratory	N Compliance Schedules	N Sludge Disposal
S Facility Site Review	S Effluent/Receiving Waters	S Self-Monitoring Program	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

( See Attachment )

Names(s) and Signature(s) of Inspector(s) Dan Powell / Dan Powell	Agency/Office/Telephone Ohio EPA - NEDO - 216-425-9171	Date 9/3/87
Signature of Reviewer Martin Hunkley	Agency/Office OEPA/NEDO	Date 9/11/87
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

Sections E thru I : Complete on all inspections, as appropriate. N/A - Not Applicable		Permit No. <b>OH0013444</b>
<b>SECTION E. Permit Verification</b>		
INSPECTION OBSERVATIONS VERIFY THE PERMIT. (Further explanation attached <u>NO</u> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(b) FACILITY IS AS DESCRIBED IN PERMIT.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(e) NOTIFICATION GIVEN TO STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
(f) ACCURATE RECORDS OF INFLUENT VOLUME MAINTAINED.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(i) ALL DISCHARGES ARE PERMITTED.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>SECTION F. Operation and Maintenance</b>		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. (Further explanation attached <u>Yes</u> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
DETAILS:		
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(c) SLUDGES AND SOLIDS ADEQUATELY DISPOSED (Further explanation attached <u>NO</u> )		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(d) ALL TREATMENT UNITS OTHER THAN BACKUP UNITS IN SERVICE.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(e) QUALIFIED OPERATING STAFF PROVIDED.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(f) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(g) ROUTINE AND PREVENTIVE MAINTENANCE ARE SCHEDULED/PERFORMED ON TIME. <u>Daily Check Pump</u>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
(h) ANY MAJOR EQUIPMENT BREAKDOWN SINCE LAST INSPECTION.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
(i) OPERATION AND MAINTENANCE MANUAL PROVIDED AND MAINTAINED.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(j) APPROVED SPCC PLAN AVAILABLE. DATE LAST UPDATED <u>198/81</u> <u>Being updated w/ RCRA Study.</u>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
(k) REGULATORY AGENCY NOTIFIED OF BYPASSING. [Dates <u>Variable-Rain Dependent</u> ]		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
(l) ANY BYPASSING SINCE LAST INSPECTION.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(m) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED. (Further explanation attached <u>Yes</u> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>SECTION G. Compliance Schedules</b>		
PERMITTEE IS MEETING COMPLIANCE SCHEDULE: (Further explanation attached <u>NO</u> )		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
COMMENTS/STATUS:		
<b>SECTION H - Self-Monitoring Program</b>		
Part I - Flow measurement (Further explanation attached <u>Yes</u> )		
PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS OF THE PERMIT.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
TYPE OF DEVICE: [ ] WEIR [ ] PARSHALL FLUME [ ] MAGMETER [ ] VENTURI METER [ ] OTHER (Specify _____)		
(b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration <u>N/A</u> )		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
(f) FLOW RECORDS ARE PROPERLY KEPT. <u>(of estimated flow)</u>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(g) ACTUAL FLOW DISCHARGED IS MEASURED. <u>See Attachment</u>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(h) FREQUENCY OF MAINTENANCE INSPECTIONS BY PLANT PERSONNEL.		<u>250</u> /year

Part 2 - Sampling (Further explanation attached NO)  
PERMITTEE SAMPLING MEETS THE REQUIREMENTS OF THE PERMIT.

Permit No.  
OH 0063444

☒ Yes ☐ No

Details: \_\_\_\_\_

- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.  
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.  
REQUIRED METHOD Grab

☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No

IF NO ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY \_\_\_\_\_

☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No

- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.  
(i) SAMPLES REFRIGERATED DURING COMPOSITING  
(ii) PROPER PRESERVATION TECHNIQUES USED  
(iii) CONTAINERS AND SAMPLE HOLDING TIMES PRIOR TO ANALYSES  
CONFORM WITH 40 CFR 136.3

☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No

- (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.  
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.

☒ Yes ☐ No ☐ N/A

- (g) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).

☒ Yes ☐ No  
☒ Yes ☐ No

- (h) ADEQUATE RECORDS MAINTAINED OF SAMPLING DATA, TIME, EXACT LOCATION, ETC.

Part 3 - Laboratory (Further explanation attached Yes)  
PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS OF THE PERMIT.

☒ Yes ☐ No ☐ N/A

DETAILS: (See Attachment)

- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3)  
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.  
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.  
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  
(e) QUALITY CONTROL PROCEDURES USED.  
(f) DUPLICATE SAMPLES ARE ANALYZED — % OF TIME. } See Attachment  
(g) SPIKED SAMPLES ARE USED — % OF TIME. }

☒ Yes ☐ No  
☐ Yes ☒ No ☒ N/A  
☐ Yes ☒ No  
☒ Yes ☐ No  
☒ Yes ☐ No

- (h) ADEQUATE RECORDS MAINTAINED OF:

- (i) ANALYSES DATES, TIME  
(ii) INDIVIDUAL PERFORMING ANALYSIS  
(iii) ANALYTICAL METHODS/TECHNIQUES USED  
(iv) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)  
(v) LAB EQUIPMENT CALIBRATION AND MAINTENANCE  
(vi) QUALITY ASSURANCE

☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No

- (i) RESULTS OF LATEST USEPA QUALITY ASSURANCE PERFORMANCE SAMPLING PROGRAM. DATE: 7-15-87

☒ SATISFACTORY ☐ MARGINAL ☐ UNSATISFACTORY

☒ Yes ☐ No

- (j) COMMERCIAL LABORATORY USED.

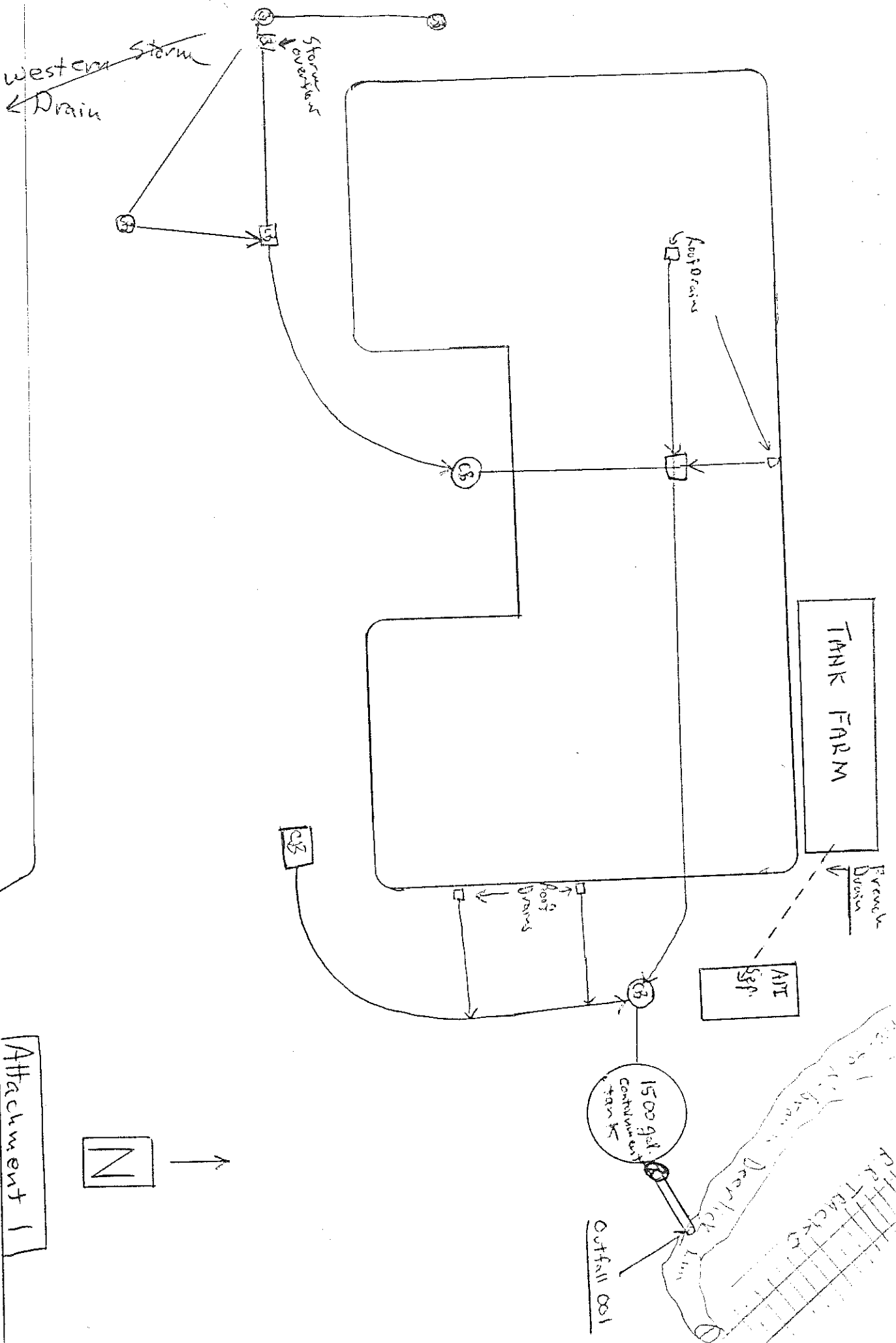
- (i) PARAMETERS ANALYZED BY COMMERCIAL LAB.

COD, pH, phenolics, phosphorus, \_\_\_\_\_, \_\_\_\_\_

LAB NAME. Wadsworth / Alert : Schaght Rd. - Cleveland

SECTION 1. Effluent/Receiving Water Observations (Further explanation attached NO)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
<u>001</u>	<u>NO</u>	<u>NB</u>	<u>SLIGHT=1</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>—</u>



Attachment 1

⊗ = Valve

⊙ = Catch Basin

DTP Hu: 11 Chemical  
9/11/87 Stormwater Flow

Klick Road



NPDES CEI REPORT  
HUKILL CHEMICAL CORPORATION  
7013 KRICK ROAD  
BEDFORD, OHIO 44146

I. Inspection Data

Inspector: Dan Powell, Ohio EPA-Twinsburg (216)425-9171

Inspection Date: 9/3/87

Previous Inspection Date: 4/16/86, OEPA-Bill Miller

=====

II. Outfall Data

A) Monitoring Station: 3IF00036 001

Water Supply: Stormwater and Groundwater Infiltration.

Contributing Processes: None, the contributing processes have been connected to sanitary sewers, as of November 1981.

Average Flow: Rainfall dependent.

Receiving Water: Unnamed tributary to North Branch of Deerlick Run -->Tinker's Creek-->Cuyahoga River-->Lake Erie

Monitored Parameters as per revised Findings and Orders: pH, COD, Total Phenolics, Total Phosphorus, Flow and Precipitation.

II. Facility Overview

Hukill Chemical Corp. operates a solvent reclaim and acid repackaging business at their Krick Road Facility. Current employment is 29 persons and the processing section operates 24 hours/day, 5 days/week and reclaims an average of 180,000 gallons of solvent/month. The acid repackaging section processes an average of 73,000 gallons/month. A recent change regarding interior processing was made in which a trench was connected to a totally enclosed steel container for spill containment reasons.

In November 1981, all process discharges to Outfall 001 were connected to sanitary sewers (POTW). Since then the discharges have been limited to precipitation runoff or groundwater infiltration into the underground piping. Non-compliance with the NPDES Permit limitations for TOC and BOD5 persisted even after disconnection of process flows.

Hukill is operating under a USEPA-RCRA Consent Agreement and Final Order (CAFO) because of past hazardous waste violations, which impact the 001 Outfall. Since the entity could not comply with its NPDES permit limitations, Ohio EPA Findings and Orders were issued in November 1985. They were recently modified and reissued on August 20, 1987, to correspond with the RCRA site investigation and cleanup. It is believed that the improper disposal of hazardous waste is the predominant reason that Hukill could not meet the limitations in its NPDES permit.

### III. Inspection Results

#### A) Purpose of Inspection

The purpose of the inspection was to ascertain the entities compliance with its NPDES permit and review the recently revised Findings and Orders (F & O's). The primary scope of the inspection included review of Hukill's Treatment System, Flow Measurement Device, and Self-Monitoring Aspects including the Sampling and Laboratory Programs.

#### B) Treatment Plant Operation and Maintenance

The only treatment plant Hukill operates is a 1500 gallon stormwater/groundwater containment tank, which is checked and pumped to an API separator on a daily or as needed basis. This is accomplished by connecting a portable pump to either 3 inch or 1.5 inch pipes, both which are permanently connected to the interior portion of the containment tank. The API tank is subsequently pumped, as needed, with the contents being treated and/or disposed of properly. Also, whenever practicable, the 1500 gallon containment tank is pumped prior to periods of impending precipitation or snow melt. The above practices were formally included in the recent F & O's as were provisions for an API separator tank integrity check. The steel separator was installed in November 1981, and is believed to be enclosed in clayey material, however it has not been tested for structural integrity since installation. It is possible that the separator may leak and impact the 001 discharge since they are in close proximity to one another. A provision for the API integrity test was also included in the recently revised F & O's. A French drain is also connected from the storage tank area to the API separator pit to contain potential spills and/or run off.

It is important to note that during periods of heavy precipitation, the containment tank overflows and discharges onto the ground and flows into surface waters. It is expected that the facility is containing the worst case (i. e. first flush) pollutant load within the containment tank, prior to overflowing, and thereby minimizes the effect on the receiving stream. Hukill is considering the replacement of the 1500 gallon tank with a larger one to collect more flow and contain potential spills from tanker trucks which could discharge through parking lot catch basins.

It was noted that a small parking lot and part of the plants western exterior, just north of this parking lot (around the acid tankage area), drains to a storm sewer which is not part of the containerized system. Further investigation and sampling of this discharge is necessary to ascertain whether this area impacts waters of the state. A map of the related discharge system is attached as attachment 1.

C) Flow Measurement

Flow measurement is entirely estimated by rainfall amounts and appropriate run-off coefficients. A rainfall gauge is employed by the facility to obtain local precipitation amounts. The use of this method versus the use of data from the National Weather Service at Cleveland-Hopkins Airport is considered superior.

D) Sampling Program

The appropriate sampling parameters and required frequency, as listed in the F & O's are as follows:

<u>Parameter</u>	<u>Frequency</u>	<u>Sampling Type *</u>
Flow (gpd)	2/month	24 hour estimate
Precip.(inches)	24 hr. total	daily measurement
COD (mg/l)	2/month	grab
Total Phenolics (ug/l)	2/month	grab
Total Phosphorus (mg/l)	1/month	grab

\* All sampling occurs during a period of flow at Outfall 001

Records are maintained on the time, gallons/hr, parameters to be analyzed, for each sample obtained. The actual flow, although not required by the permit or F & O's, is measured with a bucket. Hukill has been submitting the Discharge Monthly Reports (DMR's) as required. The samples are appropriately refrigerated, preserved and then sent to an outside laboratory (Wadsworth/Alert on Schaaf Rd. in Cleveland). Analysis is performed within appropriate holding periods. Sampling for phosphorus is occurs more often than necessary but is reported as required. On some of the DMR's there are no discharges reported, since little precipitation occurred or there was no snow melt. Samples are split and maintained in a refrigerator at Hukill. If an extreme result is encountered by the outside laboratory, the split is sent for another analysis to ensure the first result is correct.

E) Laboratory Procedures

As described in part D), all samples are analyzed by an outside lab and are presumed to be accurate.

F) Quality Assurance

Hukill submitted samples to USEPA'S QA-DMR program for COD, pH, and Phenolics. On 7/15/87, the received an acceptable Performance Evaluation Report from USEPA for their QA program. Hukill is unaware if their laboratory analyzes their samples using split, spiked or blank QA procedures.

G) Review of Self Monitoring Data

Review of data submitted as part of the DMR's revealed that the entity was under reporting phenolics by a factor of 10. This was due to incorrect conversion of the analytical results from mg/l to ug/l for reporting. The entity will reportedly correct this matter.

IV. Recommendations

Overall, Hukill is doing a good job in meeting the NPDES permit and F & O's requirements, although there are several points where improvement can be made. These are as follows:

1. The correct conversion factor should be used in the future when converting reported data in micrograms/liter (ug/l), especially phenolics. Furthermore, the extent of the under reporting of phenolics should be detailed. For example, we need to determine how long the incorrect conversion factor has been used, since this data is compiled in STORET files and may be subsequently used to set incorrect water quality standards. Consequently, we need to correct the past phenolics submittals. Therefore, please submit an account of how long the phenolic DMR data has been under-reported by this factor of ten, by October 31, 1987.
2. Hukill shall definitely consider the replacement of the 1500 gallon containment tank with a larger tank. Considering the ramifications of a tanker spill in that area and the recurring overflow of the current tank in storm event, this would be advisable.
3. Sampling of the western storm drainage system should be performed to judge whether this discharge has any impact on waters of the state. Please submit the results of COD, pH and flow sampling for this discharge, also by October 31.

Date Issued: August 20, 1987  
Date Effective: August 20, 1987

BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Hukill Chemical Corp.	:	<u>Director's Final Findings</u>
7013 Krick Road	:	<u>and Orders and Revocation</u>
Bedford, Ohio 44146	:	<u>of Prior Findings and Orders</u>

Pursuant to Ohio Revised Code, Section 6111.03(H), the Director of the Ohio Environmental Protection Agency (Ohio EPA) hereby makes the following Findings and issues the following Orders:

FINDINGS

1. Hukill Chemical Corp., hereinafter referred to as "Hukill," operates a facility located at 7013 Krick Road, Bedford, Ohio.
2. During course of operations, Hukill discharges stormwater and groundwater seepage containing organic contaminants into surface waters of the state.
3. Hukill currently holds expired NPDES Permit No. 3IF00036, authorizing Hukill to discharge condenser cooling water, yard drainage, and process wastewaters from the facility.
4. Hukill's expired NPDES Permit does not adequately reflect current operations at the facility because process wastestreams were connected to a Publicly Owned Treatment Works prior to November, 1981.
5. Although process wastewaters are routed to a sanitary sewer, analytical data indicates that contaminated stormwater and groundwater flows result in violations of Hukill's expired NPDES Permit Limitations on BOD<sub>5</sub>.
6. On November 22, 1985, the Director issued Findings and Orders pursuant to ORC, Section 6111.03(H) which required Hukill to limit the discharges from its facility to uncontaminated groundwater seepage and storm runoff, free from process wastes or other contaminants under schedules provided.

RECEIVED

AUG 21 1987

OHIO EPA-N.E.D.O.



7. Hukill has satisfactorily complied with Orders 1a. and 1b. of the schedule of compliance contained in the Director's Findings and Orders issued November 22 1985.
8. Hukill is presently under a Consent Agreement and Final Order (CAFO) signed on August 2, 1985, with the United States Environmental Protection Agency (U.S. EPA) (Docket No. V-W-85-R-014). The USEPA Orders require Hukill to determine the nature and extent of potential contamination due to storage operations in the tank farm at the site, determine the need for corrective actions, and select and implement the U.S. EPA approved corrective action.
9. The Director's Findings and Orders issued November 22, 1985 advised Hukill that if the study being conducted under the CAFO signed August 2, 1985 determined that the cause of NPDES permit effluent limitations violations was contamination associated with tank farm operations, Hukill could request that the schedule provided in the Director's Findings and Orders be revised to coincide with the schedule for corrective action under CAFO Docket No. V-W-85-R-014. On February 20, 1986 Hukill Corporation requested in writing that the November 22, 1985 Director's Findings and Orders be modified.
10. Hukill submitted to the hazardous waste authorities for Ohio EPA and U.S. EPA a Plan for Determination of the Extent of Potential Contamination that outlined six tasks for completing a Corrective Action Study Report. The U.S. EPA approved the plan by letter dated February 14, 1986.
11. Hukill completed task number 3 and submitted the Report of Site Investigation on April 10, 1987, to U.S. EPA.
12. In light of the circumstances discussed above, the compliance schedule provided in the November 22, 1985, Findings and Orders is no longer completely appropriate.
13. It is necessary that Hukill eliminate the discharge of contaminated stormwater from its facility in order to safeguard the public health, safety, and welfare.
14. The Director has given consideration to, and based his determination on evidence relating to the technical feasibility and economic reasonableness of complying with these orders and to evidence relating to conditions calculated to result from compliance with these orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of Chapter 6111 of the Revised Code.

## ORDERS

1. The Director's Final Findings and Orders issued to Hukill on November 22, 1985, are hereby revoked.
2. As expeditiously as practicable Hukill shall limit the discharge from its facility to uncontaminated groundwater seepage and storm runoff, which shall be free from process wastes or other contaminants. In no event shall Hukill attain compliance later than the dates set forth in the following schedule:
  - a. Submit, to the Northeast District Office, Ohio EPA, a conceptual design for remedial measures to limit the discharges from the facility to uncontaminated groundwater seepage and storm runoff, free from process wastes or other contaminants. This design shall be submitted within one month of U.S. EPA approval of task number 5 - Selected Conceptual Design Corrective Action (SCDCA), as described in the November 1985 engineering report Plan for Determination of the Extent of Potential Contamination. These measures may include collection and hauloff of wastewater, connection of wastewater to the sanitary sewer, removal of contaminated soil from the premises, or isolation of current activities from groundwater, rainfall runoff, and snow melt. The design shall include block diagrams of any proposed capital improvements and descriptions of any proposed improvements in operating procedures.
  - b. Submit, to the Northeast District Office, Ohio EPA, an approvable application for Permit to Install within three months of U.S. EPA approval of the SCDCA.
  - c. Complete construction of capital improvements and complete all other changes and improvements within seven months of U.S. EPA approval of the SCDCA.
  - d. Limit the discharges from the facility to uncontaminated groundwater seepage and storm runoff, free from process wastes or other contaminants within eight months of U.S. EPA approval of the SCDCA.
3. Beginning on the effective date of these Findings and Orders and lasting until the effective date of a renewal NPDES Permit, Hukill shall collect, via their existing 1500 gallon storage tank, the contaminated groundwater that enters the sewer system of outfall 001. On a daily basis, this collected effluent shall be transferred to their existing API separator. The API separator shall be pumped, as necessary, to ensure the tank is not overfilled. The contents of the API separator shall be disposed of in accordance with applicable Ohio EPA and/or U.S. EPA laws and regulations.
4. Whenever practicable, Hukill shall empty the contents of the 1500 gallon storage tank prior to periods of impending precipitation or snow melt.

5. Within three (3) months of the effective date of these Findings and Orders, Hukill shall implement a program for measuring the fluid level in the API tank for the purpose of determining API separator integrity. Daily measurements of fluid level shall be taken just prior to pumping the 1500 gallon tank and just after pumping. These measurements shall be taken for a period of two (2) months. Copies of these measurements shall be submitted to the Northeast District Office, Ohio EPA, within three (3) months from when these records started, along with a report summarizing the data as well as analyzing the integrity of the API separator. If the separator is leaking, a corrective plan to restore integrity shall be submitted as part of the report.
6. Hukill shall submit written verification to the Northeast District Office, Ohio EPA, of compliance with Orders 2c and 2d within fourteen (14) days after compliance with each Order.
7. Beginning on the effective date of these Findings and Orders and lasting until the effective date of a renewal NPDES Permit, Hukill shall comply with the effluent limitations and monitoring requirements contained in Attachment A of these Findings and Orders.
8. Hukill shall comply with all terms and conditions of expired NPDES Permit No. 3IF00036 not modified by these Findings and Orders.



Richard L. Shank, Ph.D.  
Director



Date

# ATTACHMENT A

## EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS for Outfall 3IF00036001

1. <u>EFFLUENT CHARACTERISTICS</u>			<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING			Concentration		Loading		Meas.	Sample
Code	UNITS	PARAMETER	Other Units (Specify)		kg/day		Freq.	Type
			30 day	Daily	30 day	Daily		
00056	GPD	Flow	-	-	-	-	2/month*	24 hr. estimate
00045	inches	Precipitation	-	-	-	-	Daily	24 hr. Total
00335	mg/l	Chemical Oxygen Demand	-	-	-	-	2/month*	grab
32730	ug/l	Total Phenolics	-	-	-	-	2/month*	grab
00665	mg/l	Total Phosphorus	-	-	-	-	1/month*	grab

\*During Discharge

- The pH (Reporting Codes 00400) shall be monitored 2/month during discharge by grab sample.
- Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Station 3IF00036001 at end of discharge pipe to stream, on east side of premises.
- See PART II, OTHER REQUIREMENTS of expired NPDES Permit No. 3IF00036\*.

WAIVER

Without admission of fact, violation or liability, the Hukill Chemical Corporation agrees to comply with these Orders. The Hukill Chemical Corporation hereby waives the right to appeal to the Board of Environmental Review, the issuance of or terms of these Findings and Orders, and the Director's authority to issue them.

These Findings and Orders are the complete and final resolution of the matters addressed, and Ohio EPA shall not take further enforcement action with respect to the matters herein, except to enforce the Orders should the Hukill Chemical Corporation fail to comply with them.

In the event that these Findings and Orders are appealed by any other person to the Environmental Board of Review or any court, nothing in these Findings and Orders shall preclude the Hukill Chemical Corporation's right to intervene and participate in such appeal, nor shall these Findings and Orders preclude the Hukill Chemical Corporation from raising any defenses it may have in such appeal, or in any action brought to enforce the Findings and Orders.

IT IS SO AGREED:

IT IS SO ORDERED:

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio

By: \_\_\_\_\_

*Robert J. Hukill*

Title: \_\_\_\_\_

*President*

Date: \_\_\_\_\_

*7/27/87*

*Richard H. Stark, Director*

\_\_\_\_\_  
Steven J. Grossman,  
Acting Director

Date: August 20, 1987





State Of Ohio Environmental Protection Agency

Northeast District Office  
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171



Richard F. Celeste, Governor

June 2, 1986

RE: HUKILL CHEMICAL CORP.  
CUYAHOGA COUNTY  
#02-18-0315  
OHD 001-926-740  
DIRECTOR'S FINAL FINDINGS & ORDERS

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Attn: Robert Hukill

Dear Mr. Hukill:

This letter is in response to your compliance with Order #1 of the Director's Final Findings and Orders dated April 16, 1986.

An unexpected delay in the issuance of these Findings and Orders appears to have caused some confusion. The April 15, 1986, date was not intended to be a typographical error. On May 20, 1986, this agency received a report from Hukill Corporation's consultant, Eder Associates. This letter is in response to that report.

Your assessment of the situation and your recommendations appear acceptable. I have concerns about recommendation #1 once the inlet pipe is sealed. If the "ground water seepage" entering the joints of the pipe leading to the cistern is contaminated, how will this seepage be controlled and remediated? What steps will be taken to determine the extent of this problem?

Please respond to this concern within fifteen days of receipt of this letter.

Yours truly,

Kris L. Coder  
Environmental Scientist  
Division of Solid & Hazardous Waste Management

KLC:mjo

cc: Nick Andrianas, Eder Assoc., Consulting Engrs., 85 Forest Ave., Locust Valley, NY 11560  
Craig Liska, USEPA, Region V, P.O. Box A-3587, Chicago, IL 60690-3587  
Tony Sasson, DSHWM, CO



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43266-0149  
(614) 466-8565



Richard F. Celeste, Governor

March 25, 1986

Re: Hukill Chemical Corporation  
02-18-0315/OHD001926740

Mr. Robert Hukill  
Hukill Chemical Corporation  
7013 Krich Road  
Cleveland, Ohio 44146

Dear Mr. Hukill:

I received a certificate of insurance for sudden, accidental liability insurance which appears to meet the requirements of Rule 3745-55-47 of the Ohio Administrative Code. The certificate was issued by National Union Fire Insurance Company (Policy #59962041) on behalf of the facility referenced above.

Your Letter of Credit for closure is correct and in compliance. I apologize for the mistake in addition I made in my letter of March 17, 1986.

Hukill Chemical Corporation is now in compliance with Ohio's financial responsibility requirements.

If you have questions, please contact me at (614) 462-8943.

Sincerely,

  
Deborah L. Tegtmeier  
Surveillance & Enforcement Section  
Division of Solid & Hazardous Waste Management

DLT/ara

cc: Kevin O'Grady  
Kris Coder, NEDO  
Rebecca Strom, USEPA, Region V

1008S

RECEIVED  
MAR 31 1986  
SOLID WASTE DIVISION  
U.S. EPA, REGION V

AUG 08 1985

Mark I. Wallach, Esquire  
Calfee, Halter & Griswold  
1800 Central National Bank Building  
Cleveland, Ohio 44114

Re: Hukill Chemical Corporation  
RCRA Docket No. V-W-85-P-014

Dear Mr. Wallach:

Enclosed is an executed copy of the Consent Agreement and Final Order for Hukill. This order represents a conclusion of the captioned administrative matter. Please note that payment of the penalty is due 30 days from August 2, 1985. I would also like to thank you for your courteous cooperation throughout our negotiations.

Sincerely,

David M. Taliaferro  
Associate Regional Counsel

cc: Regional Hearing Clerk

bcc: Ron Kolzow, 5HE-12  
Isalee Coleman

DTALIAFERRO/rj/ 08/06/85 Disk #2

AUG 2 1985

MEMORANDUM

SUBJECT: Hukill Chemical Corporation, Ohio V-W-85-R-014  
RCRA Administrative Settlement

FROM: Robert B. Schaefer  
Regional Counsel

Basil G. Constantelos, Director  
Waste Management Division

TO: Valdas V. Adamkus  
Regional Administrator

Attached are two copies of a Consent Agreement and Final Order for Hukill Chemical Company, Bedford, Ohio. Hukill has agreed to correct numerous RCRA violations at its facility, including closure of an illegal underground tank, study and clean up contaminated areas and pay a civil penalty of \$15,000.

We recommend that you sign both the attached orders on page 6, which will settle this administrative case.

Attachments

bcc: Kolzow, 5-HE

DTALIAFERRO/rj (07/18/85)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

IN THE MATTER OF

HUKILL CHEMICAL COMPANY  
7013 KRICK ROAD  
BEDFORD, OHIO 44146

OHD 001 926 740

)  
) DOCKET NO. V-W-85-R-014  
)  
) CONSENT AGREEMENT  
)  
) and  
)  
) FINAL ORDER

On December 27, 1984, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976 as amended (RCRA), 42 U.S.C. §6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is the Hukill Chemical Corporation.

The Parties to this action, desiring to settle the action, enter into the following stipulations:

1) Respondent has been served with a copy of the Complaint with Notice of Opportunity for Hearing on this matter, and the Regional Administrator has jurisdiction over this matter pursuant to Section 3008 of RCRA, 42 U.S.C. §6928;

2) Respondent owns and operates a facility located at 7013 Krick Road, Bedford, Ohio 44146. Respondent is an Ohio corporation whose registered agent in Ohio is Emory G. Hukill;

3) Respondent hereby admits the jurisdictional allegations contained in the Complaint;



4) Respondent neither admits nor denies the administrative factual allegations contained in the Complaint filed herein;

5) Respondent explicitly waives its rights to request a hearing on the allegations contained in the Complaint filed herein; and

6) Respondent consents to the issuance of the Order hereinafter recited, agrees to comply therewith and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated.

#### ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Order in this matter.

The Respondent, Hukill Chemical Corporation, shall comply with the following requirements;

(1) On or before the date of issuance of this Order, Respondent shall achieve and thereafter maintain compliance with all standards applicable to owners and operators of hazardous waste treatment, storage, and disposal facilities, codified at 40 C.F.R. Part 265 and Ohio Administrative Code (OAC), 3745-65 through 69.

(2) Respondent shall develop and submit to U.S. EPA and the Ohio Environmental Protection Agency (OEPA), within fourteen (14) days of the issuance of this Order, an approvable plan and implementation schedule for determining the extent of potential contamination both within and outside of the diked storage area in the solvent tank farm. The plan shall address the nature and extent of possible soil and groundwater contamination resulting from the facility's past storage and disposal practices.

The plan shall also include a time frame for submitting a corrective action plan. A draft of the contamination plan entitled Plan for Determining the Extent of Potential Contamination dated February 1984, and prepared by Eder Associates Consulting Engineers, P.C., has been reviewed by the U.S. EPA and OEPA. Written comments made on this draft by U.S. EPA and OEPA shall be adequately addressed in the final plan in order to consider it an approvable plan.

(3) After the contamination study of the solvent tank farm has been completed, a <sup>TASK 3</sup> ~~corrective action plan~~<sup>TASK 4 & 5</sup> addressing the results of the investigation shall be submitted to the U.S. EPA within the approved time frame contained <sup>TASK 5</sup> in the contamination study. The remedial<sup>TASK 5</sup> measures shall contain a schedule for implementation and shall address, at a minimum, the removal of the stand-pipes, installation of a system for removal of all standing liquids, and a method to prevent overtopping of the tanks. Once the corrective measures have been ~~approved by the U.S. EPA~~, the corrective measures shall be implemented <sup>TASK 6</sup> within the approved time frames.

(4) Respondent has developed and submitted to U.S. EPA and OEPA a closure plan for the underground cistern in accordance with OAC 3745-66-10 through 15. Once the plan is approved by OEPA, Respondent shall carry out the closure plan in accordance with the approved time frames.

Respondent asserts that all floor drains in the active portion of the facility which connect to the underground cistern are now permanently sealed. Respondent shall certify to this as part of the closure certification. Also, Respondent shall demonstrate that they have adequate financial assurance as required by OAC 3745-66-43 to carry out the closure plan as specified.

(5) Respondent shall immediately begin and thereafter continue to maintain adequate aisle space in the container storage areas as required by OAC 3745-65-35.

(6) Respondent shall immediately begin and thereafter continue to store hazardous waste in containers which are in good condition as required by OAC 3745-55-71.

(7) All documents which Respondent submits in accordance with this Order shall be submitted to both U.S. EPA and OEPA for review and approval. Respondent shall respond to modifications requested by U.S. EPA or OEPA in the documents and resubmit them within fifteen (15) days of receipt of the notification of modification. Extensions of such time may be granted by U.S. EPA and will not be unreasonably withheld. Failure to submit required documents in a timely manner, or failure to adequately respond to requested modifications, shall be a violation of this Order.

(8) Respondent shall notify U.S. EPA and OEPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the times stipulated above to the U.S. EPA, Region V, Waste Management Division, Hazardous Waste Enforcement Branch, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Mr. Ronald Kolzow, RCRA Enforcement Section.

A copy of these documents and all correspondence regarding this Order shall also be submitted to Ms. Paula Cotter, Office of Hazardous Materials Management, OEPA, 361 East Broad Street, Columbus, Ohio 43216.

(9) Respondent shall pay a civil penalty in the amount of FIFTEEN THOUSAND DOLLARS (\$15,000) payable to the Treasurer of the United States of America, within thirty (30) days of entry of this Consent Agreement and Final Order. Payment shall be made in the form of a certified or cashier's check mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673.

Copies of the transmittal of the payment shall also be made to: Regional Hearing Clerk, Region V, U.S. EPA, Planning and Management Division, 230 South Dearborn Street, Chicago, Illinois 60604 and to Isalee Coleman, Office of Regional Counsel, Region V, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority should the U.S. EPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

The above Consent Agreement and Final Order is hereby consented to by both of the parties to this proceeding.

Agreed this 12th day of July, 1985

HUKILL CHEMICAL CORPORATION

By: Robert L. Hukill

Robert L. Hukill

Title: Vice President, General Manager

and James P. Hukill

James P. Hukill

Title: Vice President, Finance

Agreed this 2<sup>nd</sup> day of August, 1985

Basil G. Constantelos  
Basil G. Constantelos, Director  
Waste Management Division

U.S. Environmental Protection Agency  
Region V  
Complainant

The above being agreed and consented to, it is so ordered this 2<sup>nd</sup>  
day of August, 1985.

Valdas V. Adamkus  
Valdas V. Adamkus  
Regional Administrator  
United States Environmental Protection Agency  
Region V





Re: Hukill Chemical Corp.  
Cuyahoga County  
02-18-0315/0HD001926740

July 10, 1985

James P. Hukill, Finance  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Dear Mr. Hukill:

I have received an amendment to Letter of Credit #SB23748 issued by AmeriTrust Company. This amendment increases the face value from \$70,000.00 to \$88,500.00.

By this letter I am also notifying U.S. EPA, Region V of your compliance with the settlement provision between Hukill Chemical Co. and the U.S. EPA.

If you have questions, please contact me at (614) 462-8943.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deborah L. Tegtmeyer", is written over the typed name.

Deborah L. Tegtmeyer  
Surveillance & Enforcement Section  
Division of Solid & Hazardous Waste Management

DLT/maf

cc: Kevin O'Grady, DSHWM  
Dave Wertz, NEDO  
Ron Kolzan, U.S. EPA, Region V

RECEIVED

JUL 15 1985

U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE ENFORCEMENT BRANCH

APR 25 1985

### Hukill Chemical Company Penalty

Ron Lillich, Environmental Scientist  
RCRA Enforcement Section

David Taliaferro, Attorney  
Office of Regional Counsel

On December 28, 1984, an AO was issued against Hukill Chemical Company with a penalty of \$42,125 for certain RCRA violations. The penalty did not include any amount for economic benefit. A settlement conference was held on 1/23/85. At the settlement conference, the facility voluntarily submitted financial documents to support their inability to pay the penalty argument. A D&B sheet for the facility was also obtained from NEIC. Mr. Tom Goltz evaluated these financial documents and it appears that the facility has a valid argument. The facility has shown decreasing earnings for the last several years and there is some question about the facility's ability to stay in business.

It is my recommendation that the penalty be substantially reduced not only because of their inability to pay argument but also because of the following factors:

- (1) Part of the facility's business is conducting recycling of spent solvents through their distillation column and two LUWA thin film evaporators. The facility does provide a valuable service in the hazardous waste field by providing this recycling service. To lose this type of facility, could possibly be detrimental to the RCRA and CERCLA program
- (2) The facility did submit a Part B and it has now been judged complete and technically adequate. A draft Part B is now being prepared by the State.
- (3) The facility did have some problems in the past with RCRA compliance. However, it appears that the facility has reversed that trend and have made a good faith effort to correct their problems and appear to be cooperative. They have submitted what appears to be an adequate closure plan for an underground cistern and a plan to address past releases in the solvent tank farm area. The facility did have a serious problem in the past with too many drums in storage. The facility has made a good faith effort in reducing this inventory well below their Part A limit and have improved the physical storage of the drums.
- (4) The facility will probably need to spend a substantial amount of money for closure of the underground cistern and remedial measures in the solvent tank farm area.



It is my recommendation that we substantially reduce the penalty amount and consider a delayed payment schedule. The delayed payment schedule would be contingent upon an increase in sales. I suggest (in conjunction with Tom Golz) the following wording in the CAFO:

The respondent shall, within 30 days of the signing of this CAFO, make a partial payment of penalty in settlement of this complaint in the amount of \$5,000 (Five-thousand dollars). Payment shall be by certified check made payable to the Treasurer of the United States.

On January 31, 1986, respondent shall make a further partial payment of civil penalty, the amount of the partial payment to be determined by the sales of Hukill. If sales for the Hukill Chemical Company for the year ending October 31, 1985 equal or exceeds \$7,000,000 (Seven million dollars), the amount of partial payment due January 31, 1986 shall be \$10,000 (Ten-thousand dollars). If sales are less than \$7,000,000 (Seven million dollars), the amount of partial payment then due shall be \$5,000 (Five-thousand).

On January 31, 1987 -----7 million ----- 10,000/5,000

INITIALS	TYPYST JK	AUTHOR NJR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	VMD
DATE	4/25/85							

# Calfee, Halter & Griswold

Attorneys at Law  
1800 Central National Bank Building  
Cleveland, Ohio 44114

(216) 781-2166  
Telex 980499

March 27, 1985

RECEIVED  
MAR 29 1985  
HUEB

Region Hearing Clerk  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Re: In the Matter of Hukill Chemical Corporation  
Docket No. V-W-85R-014

Dear Sir:

Please find enclosed herewith Hukill Chemical Corporation's Motion for Extension of Time and proposed Order which we are filing with you today. Also enclosed is an extra copy of the Motion for Extension of Time and Order which we would ask that you time stamp to evidence receipt and return to the undersigned in the enclosed self-addressed envelope.

Thank you for your attention to this matter.

Very truly yours,

Mark I. Wallach

MIW:fmm  
Enclosures  
078S1/13432A

cc: Regional Administrator )  
David Taliaferro, Esq. ) (w/enclosure)  
✓ Mr. Ron Lillich

IN THE MATTER OF: )  
 )  
HUKILL CHEMICAL CORPORATION )  
7013 Krick Road )  
Bedford, Ohio 44146 )  
(EPA ID No. OHD001-926-740) ) Docket No. V-W-85R-014

Pursuant to the Agency's Consolidated Rules of Practice governing the administrative assessment of civil penalties and the revocation or suspension of permits, 40 C.F.R. § 22.07(b), Respondent, Hukill Chemical Corporation, respectfully requests an extension of time up to and including June 3, 1985, to answer the Complaint, Findings of Violation, and Compliance Order and to request a hearing in the above-captioned matter.

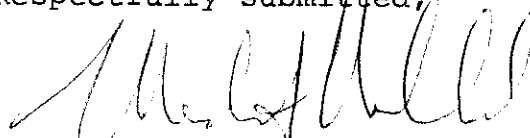
As required by the Agency's Rules and as set forth in the Complaint, Hukill Chemical must request in writing a public hearing on the Order no later than 30 days from the date the Order was served. In addition, Hukill Chemical is required to file a written Answer to the Complaint with the Region Hearing Clerk, also within 30 days of the receipt of the Notice. As a result of an informal settlement conference with the Agency, on January 23, 1985, it appears that the Agency and Hukill Chemical will probably be able to settle the violations and civil penalties alleged in the Complaint without a hearing or further proceedings.

Engineering studies are presently being conducted pursuant to the results of that conference.

Hukill Chemical has requested one prior extension of time in this matter, and believes that this matter ought to be resolved within the period of time herein requested.

Accordingly, Hukill Chemical respectfully requests that the Presiding Officer grant an extension of time, up to and including June 3, 1985, to answer the Complaint and request a hearing on this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark T. Wallach", is written over a horizontal line.

MARK T. WALLACH  
CALFEE, HALTER & GRISWOLD  
1800 Central National Bank Bldg.  
Cleveland, Ohio 44114  
(216) 781-2166

Attorney for Respondent  
Hukill Chemical Corporation



CERTIFICATE OF SERVICE

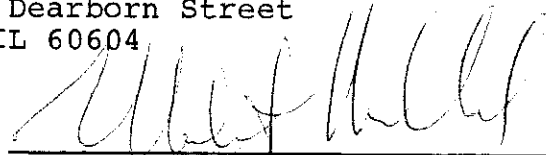
Copies of the foregoing Motion for Extension of Time were sent by United States Mail, postage prepaid, on this 7<sup>th</sup> day of March, 1985 to the following:

Region Hearing Clerk  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

David M. Taliaferro, Esq.  
Assistant Regional Counsel  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Mr. Ron Lillich  
Waste Management Branch  
Technical Permits and Compliance Section  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Regional Administrator  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604



One of the Attorneys for  
Respondent Hukill Chemical  
Corporation

IN THE MATTER OF: )  
 )  
HUKILL CHEMICAL CORPORATION )  
7013 Krick Road )  
Bedford, Ohio 44146 )  
(EPA ID No. OHD001-926-740) ) Docket No. V-W-85R-014

07851/13432

**Calfee, Halter & Griswold**

Attorneys at Law  
1800 Central National Bank Building  
Cleveland, Ohio 44114

(216) 781-2166

Telex 980499

RECEIVED  
JAN 28 1985

HWEB

January 25, 1985

Region Hearing Clerk  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Re: In the Matter of Hukill Chemical Corporation  
Docket No. V-W-85R-014

Dear Sir:

Please find enclosed herewith Hukill Chemical Corporation's Motion for Extension of Time and proposed Order which we are filing with you today. Also enclosed is an extra copy of the Motion for Extension of Time and Order which we would ask that you time stamp to evidence receipt and return to the undersigned in the enclosed self-addressed envelope.

Thank you for your attention to this matter.

Very truly yours,

  
Mark I. Wallach

MIW:fm  
Enclosures  
078S1/13432A

cc: Regional Administrator )  
David Taliaferro, Esq. ) (w/enclosure)  
Mr. Ron Lillich

IN THE MATTER OF: )  
 )  
HUKILL CHEMICAL CORPORATION )  
7013 Krick Road )  
Bedford, Ohio 44146 )  
(EPA ID No. OHD001-926-740) ) Docket No. V-W-85R-014

Pursuant to the Agency's Consolidated Rules of Practice governing the administrative assessment of civil penalties and the revocation or suspension of permits, 40 C.F.R. § 22.07(b), Respondent, Hukill Chemical Corporation, respectfully requests an extension of time up to and including April 2, 1985, to answer the Complaint, Findings of Violation, and Compliance Order and to request a hearing in the above-captioned matter.

As required by the Agency's Rules and as set forth in the Complaint, Hukill Chemical must request in writing a public hearing on the Order no later than 30 days from the date the Order was served. In addition, Hukill Chemical is required to file a written Answer to the Complaint with the Region Hearing Clerk, also within 30 days of the receipt of the Notice. As a result of an informal settlement conference with the Agency, on January 23, 1985, it appears that the Agency and Hukill Chemical will probably be able to settle the violations and civil penalties alleged in the Complaint without a hearing or further proceedings.

Hukill Chemical has not requested any prior extensions of time in this matter, and believes that this matter ought to be resolved within the period of time herein requested. Counsel for the Agency, David M. Taliaferro, Esq., has indicated that he has no objection to this motion.

Accordingly, Hukill Chemical respectfully requests that the Presiding Officer grant an extension of time, up to and including April 2, 1985, to answer the Complaint and request a hearing on this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Mark I. Wallach', is written over a horizontal line.

MARK I. WALLACH  
CALFEE, HALTER & GRISWOLD  
1800 Central National Bank Bldg.  
Cleveland, Ohio 44114  
(216) 781-2166

Attorney for Respondent  
Hukill Chemical Corporation

CERTIFICATE OF SERVICE

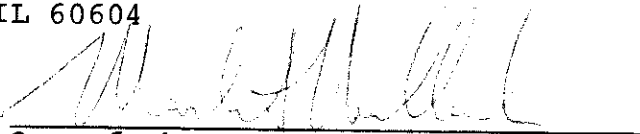
Copies of the foregoing Motion for Extension of Time were sent by United States Mail, postage prepaid, on this 25<sup>th</sup> day of February, 1985 to the following:

Region Hearing Clerk  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

David M. Taliaferro, Esq.  
Assistant Regional Counsel  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Mr. Ron Lillich  
Waste Management Branch  
Technical Permits and Compliance Section  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

Regional Administrator  
U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, IL 60604

  
One of the Attorneys for  
Respondent Hukill Chemical  
Corporation



IN THE MATTER OF: )  
 )  
HUKILL CHEMICAL CORPORATION )  
7013 Krick Road )  
Bedford, Ohio 44146 )  
(EPA ID No. OHD001-926-740) ) Docket No. V-W-85R-014

For good cause shown, Respondent, Hukill Chemical Corporation, is granted an extension of time up to and including April 2, 1985 to answer the Complaint and to request a hearing in this matter.

Date: \_\_\_\_\_, 1985

078S1/13432

# HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146 • 216/232-9400

*Over Thirty-Five Years of Quality Products and Services*

January 21, 1985

Mr. Ron Lillich  
U.S. EPA Region V  
Waste Management Division  
230 South Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
JAN 22 1985  
WASTE MANAGEMENT  
BRANCH

Dear Ron:

I wish to confirm our conversation of Tuesday, January 8, 1985. You stated that Hukill Chemical Corporation would be in compliance with the Compliance Order in regards to the January 15th deadline on Technical Response. This was based on the information submitted on December 31, 1984, and with the understanding that issues relating to Chem Fuel are on hold right now, and that an extension of time was needed to provide the proper information to put the East and West Feed tanks in our Part B as hazardous waste storage tanks.

You requested a statement regarding the status of the feed tanks and a schedule of events for their completion. The delay on the Feed Tanks was due to our strong feeling that these tanks did not belong in the same class as the HW storage tanks. We felt an average of 24 hours residence time was adequate, but as a maximum, it was too restrictive. We tried to come up with another set of criteria for feed tanks. All of our options entailed more complex and detailed record keeping and managing. We gave up the effort but had used up the 60 day time allowance. Therefore, we requested a 45 day extension to provide the required information.

During this period, we will manage the tanks under the 24 hour approach and they will stand empty over the weekend. We would request that in the case of a machine break down during the week, that we be allowed an additional 24 hours of residence in the tank. This would not apply over the weekends.

The following is the schedule for putting the two tanks on the permit as HW tanks:

1. Prints completed January 25, 1985
2. Ultra Sound completed February 1, 1985
3. Engineer's report completed February 12, 1985
4. Submit to EPA February 15, 1985

As you see, we were not able to improve on the 45 day schedule.  
I trust that I have addressed your concerns, but if you have any questions,  
please give me a call.

Very truly yours,

HUKILL CHEMICAL CORPORATION



Robert L. Hukill  
Vice President  
General Manager

RLH/sj

cc: Richard Shank  
Office of Hazardous Materials Management  
Ohio EPA  
361 East Broad Street  
Columbus, Ohio 43216

Mr. Mark Wallach  
Calfee, Halter & Griswold  
1800 Central National Bank Building  
Cleveland, Ohio 44114

# HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146 • 216/232-9400

*Over Thirty-Five Years of Quality Products and Services*

January 4, 1985

Mr. Ron Lillich  
U.S. EPA, Region V  
Waste Management Div., RCRA Section  
230 South Dearborn Street  
Chicago, Illinois 60604

Ref: Compliance Order Dated December 27, 1984

Dear Mr. Lillich:

In response to Item C of "Orders and condition for Continued Operation," we have been in compliance on adequate aisle space since August 24, 1984.

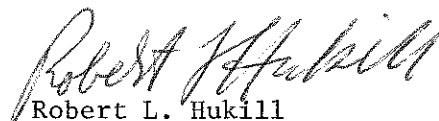
I am submitting my letter to Kris Coder dated August 24, 1984 and a copy of the last RCRA inspection in December that noted that we are in compliance as of that inspection.

I will be in touch with you regarding the Part B responses.

Please give me a call if you have any questions regarding this matter.

Very truly yours,

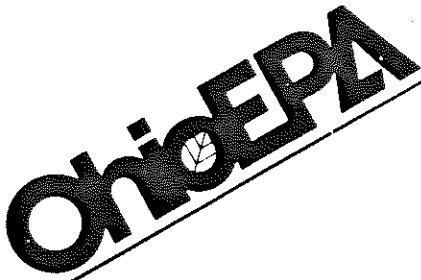
HUKILL CHEMICAL CORPORATION

  
Robert L. Hukill  
Vice President  
General Manager

RLH/sj

cc: Kris Coder  
Richard Shank

Enclosure



Re: Hukill Chemical Corporation  
Cuyahoga County  
#02-18-0315  
OHD 001-926-740  
G-T-TSDF

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

December 28, 1984

Attn: Robert Hukill

Dear Mr. Hukill:

On December 6, 1984, I conducted a hazardous waste inspection of Hukill Chemical Corporation located at 7013 Krick Road. You and David Marlin represented this facility during the inspection. The facility was inspected for compliance with both State and Federal regulations for the handling of hazardous wastes.

The following violations and/or concerns were noted during this inspection:

<u>Description of Violation or Concern</u>	<u>Regulation</u>
1. Hukill, as generator and transporter of hazardous wastes, failed to sign as a transporter of hazardous wastes on manifest no.'s 144 and 155 dated June 13, 1984 and July 6, 1984, respectively. Hukill, as generator, failed to sign in the correct place on manifest 160 dated September 13, 1984.	OAC 3745-52-23 OAC 3745-53-20
2. Hukill needs to add to the inspection record, weekly inspections of the construction materials of the treatment process or equipment to detect corrosion or leaking of fixtures or seams.	OAC 3745-69-03

Please submit documentation for corrections of these above violations to my attention at the Ohio EPA, Northeast District Office, within 30 days of receipt of this letter.

During the inspection it was noted that in the east warehouse, hazardous waste liquid drum storage continues to improve. Total drum inventory (both solid and liquid wastes) was within permitted limits. Adequate aisle space was noted between pallets of drums which were stacked two high. All drums appeared to be in good condition. There was no evidence of any leaking drums or spilled material. Several solid waste drums were being stored in the east warehouse until they could be overpacked for CECOS shipment.

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- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO



Lillich

5HW-12

HWEB

(Name of Sender)

EPA  
REGION V  
230 SOUTH DEARBORN  
CHICAGO IL 60604

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USE, \$300

RETURN  
TO



U.S. EPA?/REGION V/RON LILlich/RCRA SECTION

(Name of Sender)

230 SOUTH DEARBORN STREET

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

CHICAGO, ILLINOIS 60604

(City, State, and ZIP Code)



PS Form 3811, July 1983

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1. ☐ Show to whom, date and address of delivery.  
 2. ☐ Restricted Delivery.

3. Article Addressed to: R. Hukill, VP  
 Hukill Chemical Corp.  
 7013 Krick Rd  
 Bedford, OH 44146

## 4. Type of Service:

- ☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail

Article Number

P 602 533 149

Always obtain signature of addressee or agent and  
**DATE DELIVERED.**

5. Signature - Addressee

X *Rita Mitchell*

6. Signature - Agent

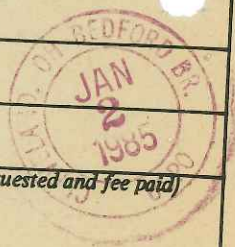
X

7. Date of Delivery

1/2/85

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT



PS Form 3811, July 1983

**SENDER: Complete items 1, 2, 3 and 4.**

57W-13

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1. ☐ Show to whom, date and address of delivery.  
 2. ☐ Restricted Delivery.

3. Article Addressed to:  
 EMORY G. HUKILL, REGISTERED AGENT  
 FOR HUKILL CHEMICAL CORPORATION,  
 7013 KRICK ROAD,  
 BEDFORD, OHIO 44146

## 4. Type of Service:

- ☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail

Article Number

P 609 294 052

Always obtain signature of addressee or agent and  
**DATE DELIVERED.**

5. Signature - Addressee

X *Rita Mitchell*

6. Signature - Agent

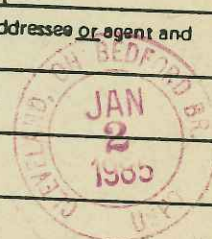
X

7. Date of Delivery

1/2/85

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

DEC 27 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Emory G. Hukill  
Registered Agent for  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Re: Findings of Violation and  
Compliance Order  
Hukill Chemical Corporation  
EPA ID No.: **OHD 001-926-740**

**V-W- 85 R-014**

Dear Sir:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by Hukill Chemical Corporation of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6901 et seq., based on inspections of the facility located at 7013 Krick Road, Bedford, Ohio 44146.

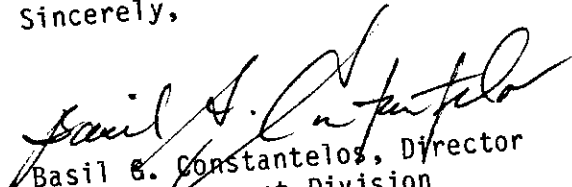
The Compliance Order states the reason for such a determination, establishes a compliance schedule and assesses civil penalties for the violations as set forth in the Compliance Order. The Compliance Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. § 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing, and Consolidated Rules of Practice in 40 CFR Part 22, Fed. Reg. 2460 (April 9, 1980), as amended by 45 Fed. Reg. 79808 (December 2, 1980). I recommend that the enclosed Compliance Order and Consolidated Rules be carefully read and analyzed to help you choose among the alternatives available in responding to the Order. A written request for a hearing is required to be filed with the Regional Hearing Clerk within 30 days of receipt of this Compliance Order. A copy of your hearing request should be sent to David M. Taliaferro, Assistant Regional Counsel, 230 South Dearborn Street, Chicago, Illinois 60604.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of the Compliance Order, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for purpose of settlement with Waste Management Division Staff, please contact Mr. Ron Lillich, Waste Management Branch, Technical, Permits, and Compliance Section, 230 South Dearborn Street, 12th floor, Chicago, Illinois 60604. His phone number is (312) 886-4460.

Sincerely,

  
Basil G. Constantelos, Director  
Waste Management Division

Enclosure

cc: Robert Hukill, Vice President  
Hukill Chemical Corporation

Richard Shank, OEPA  
Office of Hazardous Materials Management



DEC 27 1984

# P-609 294-052

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Emory G. Hukill  
Registered Agent for  
7013 Krick Road  
Bedford, Ohio 44146

RE: Findings of Violations and  
Compliance Order  
Hukill Chemical Corporation  
EPA ID No.: **OH0 001-926-740**

Dear Sir:

V-W- 85 R-014

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by Standard Oil Company of Ohio of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6901 et seq., based on inspections of the facility located at 7013 Krick Road, Bedford, Ohio 44146.

The Compliance Order states the reason for such a determination, establishes a compliance schedule and assesses civil penalties for the violations as set forth in the Compliance Order. This Compliance Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. §6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing and a copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits." I recommend that the enclosed Compliance Order and Rules of Practice in 40 CFR Part 22, Fed. Reg. 24360 (April 9, 1980), as amended by 45 Fed. Reg. 79808 (December 2, 1980), be carefully read and analyzed to determine the alternatives available in responding to the Order. A written request for a hearing is required to be filed with the Regional Hearing Clerk within 30 days of receipt of this Compliance Order. A copy of your hearing request should be sent to David Taliaferro, Assistant Regional Counsel, 230 South Dearborn Street, Chicago, Illinois 60604.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of the Compliance Order, you are extended an opportunity to request an informal settlement conference.

/ / / /

If you have any questions or desire to request an informal conference for purpose of settlement with Waste Management Division Staff, please contact Mr. Ron Lillich, Waste Management Branch, Technical, Permits, and Compliance Section, 230 South Dearborn Street, 12th Floor, Chicago, Illinois 60604. His phone number is (312) 886-5199.

Sincerely,

Basil G. Constantelos, Director  
Waste Management Division

Enclosure

cc: Robert Hukill, Vice President ✓  
Hukill Chemical Corporation

Richard Shank, OEPA ✓  
Office of Hazardous Materials Management

bcc: Denise Reape ✓  
TPCS Secretary

Regional Hearing Clerk ✓  
Gloria Small Moran (5C-16) ✓

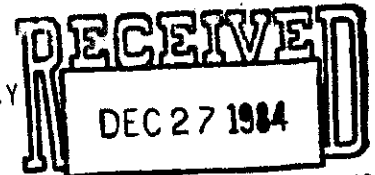
OFFICE OF Waste Program WH-527 ✓

5HW-13:R.Lillich:G.Words:EDITED 10/84  
✓

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMS CHIEF
		<i>Edwards</i>						
		<i>10/84</i>						

*BA*  
*12/4/84*  
*R/c*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V



REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY

DOCKET NO.

COMPLAINT, FINDING  
OF VIOLATIONS  
AND ORDER

IN THE MATTER OF:

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

EPA ID No. OHD 001-926-740

V-W- 85 R-014

This Complaint is pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. §6928, and is equivalent to a Compliance Order referred to in that Section. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Hukill Chemical Corporation, located at 7013 Krick Road, Bedford, Ohio 44146.

INTRODUCTION

This Complaint is based on information available to U.S. EPA including compliance inspections conducted by the Ohio Environmental Protection Agency (OEPA) as an authorized representative of the U.S. EPA on April 29, 1981, May 27, 1982, April 28, 1983 and May 10, 1983. A joint site visit was also conducted by U.S. EPA and OEPA on July 11, 1983, and a joint compliance inspection on July 10, 1984. At the time of the inspections, violations of applicable Federal statutes and applicable Federal and State regulations were identified.

On July 15, 1983, the State of Ohio received Phase I interim authorization pursuant to Section 3005 of RCRA (42 U.S.C. § 6925). This authorization allows the State and U.S. EPA to enforce those portions of Ohio regulations where applicable in lieu of Federal statutes. U.S. EPA has retained authority in those areas where State authorization has not been delegated. Accordingly, this Compliance Order enforces both Federal and State regulations as applicable. Pursuant to 42 U.S.C. §6928(a) and



based on information cited herein, it has been determined that Hukill Chemical Corporation has violated regulations promulgated under Subtitle C of RCRA, Sections 3004 and 3005, 42 U.S.C. §6924 and § 6925; Federal regulations 40 CFR 270.13(h), 40 CFR 265.14, 40 CFR 265.15, 40 CFR 265.35, 40 CFR 265.52(f), 40 CFR 265.72, 40 CFR 265.73, 40 CR 265.173, 40 CFR 265.194 and 40 CFR 270.10 and Ohio Administrative Code (OAC) regulations 3745-54-31, 3745-54-15, 3745-65-35, and 3745-55-71.

#### FINDINGS

This determination of violation is based on the following:

1. Section 3010 of RCRA requires any person who generates or transports hazardous waste or owns or operates a facility for the treatment, storage, or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to regulations may be transported, treated, stored, or disposed of unless the required notification has been given. 42 U.S.C. §6930.
2. U.S. EPA published regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste handling was required in most instances no later than August 19, 1980.
3. Section 3005 of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123).

The regulations require that persons who treat, store, or dispose of hazardous waste Submit Part A of the permit application in most instances no later than November 19, 1980.

4. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application if:

(1) the facility was in existence on November 19, 1980;

(2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied with; and

(3) application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

RESPONDENT

5. The Respondent, Hukill Chemical Corporation, owns and operates a facility at 7013 Krick Road, Bedford, Ohio 44146. The Respondent is an Ohio corporation whose registered agent in Ohio is Emory G. Hukill, 7013 Krick Road, Bedford, Ohio 44146.

6. The Respondent is in the business of reclaiming spent chemicals from various sources, and blending and packaging acids. It is also engaged in chemical drum storage and above-ground bulk storage of chemical wastes, acids and other reprocessed chemicals. It has achieved interim status to store hazardous waste in containers and tanks. The Respondent was required to submit an application for a final permit to operate the facility by September 30, 1982.

7. Respondent's facility is located in an industrial parkway. It is situated on an unnamed tributary to Tinkers Creek. Tinkers Creek flows through the Cleveland Metroparks and then empties into the Cuyahoga River.

#### TANK FARM VIOLATIONS

8. Section 3004 of Subtitle C of RCRA, provides, in pertinent part, as follows:

"The Administrator [of the U.S. Environmental Protection Agency] shall promulgate regulations establishing such performance standards, applicable to owners and operators of facilities for the treatment, storage, or disposal of hazardous waste identified or listed under this Subtitle, as may be necessary to protect human health and the environment."

Regulations implementing Section 3004 of the RCRA were promulgated by the Administrator on May 19, 1980. The effective date of these regulations is November 19, 1980.

9. The hazardous waste management regulations require owners and operators of hazardous waste management facilities to maintain and operate such facilities in a manner that minimizes the possibility of threat to human health or the environment from any fire, explosion, or unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents into the air, soil or surface waters. OAC 3745-54-31.

10. Owners and operators of hazardous waste facilities are required to conduct frequent inspections for malfunctions and deterioration, operator errors, and discharges which may be causing or lead to a threat to human health or releases of hazardous waste constituents to the environment, and to take steps to remedy such problems to insure that they do not lead to an environmental or human health threat. OAC 3745-54-15.

11. Respondent has violated the regulations cited in paragraphs 9 and 10 above; as a result hazardous waste and hazardous waste constituents have been released into

the solvent tank farm area with the potential of contaminating the soil and groundwater, and creating a potential threat to human health and the environment.

#### PART A PERMIT REQUIREMENT VIOLATIONS

12. Owners and operators of hazardous waste management facilities were required to submit a scale drawing showing all past, present and future treatment, storage and disposal areas at their facilities by November 19, 1980. 40 CFR 270.13(h).

13. On November 12, 1980, Respondent submitted a scale drawing to U.S. EPA of storage and disposal areas that failed to illustrate a buried cistern or tank located on the east side of Respondent's property. Submittal of the incomplete drawing is a violation of 40 CFR Section 270.13(h). The buried tank has received hazardous waste and hazardous waste waters from the facility's solvent reclaiming operations for storage. The tank is corroding, and wastes or waste waters from the buried tank have been or may be released into the surrounding soils as a result of tank corrosion and thus constitutes a potential threat to human health and the environment.

#### HAZARDOUS WASTE MANAGEMENT VIOLATIONS

14. RCRA compliance inspections of the facility were conducted by the OEPA as an authorized representative of the U.S. EPA on April 29, 1981, May 27, 1982, and April 28, 1983 and May 10, 1983. A joint site visit was also conducted by the U.S. EPA and OEPA on July 11, 1983 and a joint compliance inspection on July 10, 1984.

15. The following violations were observed during an OEPA April 29, 1981, inspection:

- (a) Failure to keep records of malfunctions, records of operator error, and records of discharges as required by 40 CFR 265.15;

- (b) Failure to include in the contingency plan an evacuation plan for facility personnel as required by 40 CFR 265.52(f).
- (c) Failure to provide controlled entry to the facility as required by 40 CFR 265.14; and
- (d) Failure to maintain an operating record as required by 40 CFR 265.73.

16. The Respondent was notified of the violations and provided a copy of the April 29, 1981, inspection by an OEPA letter dated August 26, 1981.

17. The following violations were observed during an OEPA May 27, 1982, inspection:

- (a) Failure to have an artificial or natural barrier completely surrounding the active portion of the facility as required by 40 CFR 265.14(b)(2)(i); and
- (b) Failure to provide controlled entry to the facility as required by 40 CFR 265.14(b)(2)(ii).

18. The Respondent was notified of the violations and provided a copy of the May 27, 1982, inspection by an OEPA letter dated August 17, 1982.

19. The following violations were observed during OEPA inspections on April 28 and May 10, 1983:

- (a) Failure to maintain a log which records inspections of the loading and unloading areas as required by 40 CFR 265.15(b)(4) and 40 CFR 265.15(d);
- (b) Failure to include in the written operating record the U.S. EPA hazardous waste numbers and handling codes for the hazardous waste in the storage areas as required by 40 CFR 265.73(b)(1); and

(c) Failure to include all the necessary information on the tank inspection log as required by 40 CFR 265.194.

20. The Respondent was notified of the violations and provided a copy of the April 28 and May 10, 1983, inspection report by an OEPA letter dated May 19, 1983.

21. The following violations were observed during an OEPA/U.S. EPA joint site visit on July 11, 1983:

(a) Failure to provide adequate aisle space in several sections of the drum storage areas as required by 40 CFR 265.35;

(b) Failure to store certain drums in a closed position as required by 40 CFR 265.173; and

(c) Failure to submit a revised Part A and receive U.S. EPA approval for an increase in storage capacity of drums as required by 40 CFR 270.72(b).

22. The following violations were observed during an July 10, 1984 OEPA/U.S. EPA joint inspection:

(a) Failure to provide needed aisle space in several sections of the drum storage areas as required by OAC 3745-65-35; and

(b) Failure to store a container holding hazardous waste in good condition as required by OAC 3745-55-71.

23. The Respondent was notified of the violations and provided a copy of July 10, 1984, inspection by an OEPA letter dated July 24, 1984.

#### PART B PERMIT REQUIREMENT VIOLATIONS

24. In a letter dated March 31, 1982, U.S. EPA required the Respondent to submit Part B of its permit application, pursuant to 40 CFR 270.10(e)(4).

The Respondent submitted a Part B application on September 30, 1982.

25. In a letter dated October 25, 1982, the U.S. EPA requested OEPA to conduct a completeness review. In a letter dated November 10, 1982, the OEPA informed U.S. EPA that a completeness check had been conducted and several required items had not been submitted. In a letter dated December 1, 1982, to Respondent, U.S. EPA detailed the deficiencies found and requested that the Respondent submit the required information within 30 days.

26. In a letter dated February 23, 1983, the Respondent submitted additional information to U.S. EPA addressing the deficiencies noted by U.S. EPA. This submittal was almost two months past the due date.

27. In a letter dated March 17, 1983, U.S. EPA requested that the OEPA perform a completeness review of the additional information submitted by the facility. In a letter to U.S. EPA dated March 29, 1983, the OEPA stated that the Part B application was judged to be complete. In a letter to Respondent dated August 22, 1983, U.S. EPA stated that the Part B application was complete and that the adequacy review would now begin.

28. In a letter dated October 4, 1983, to U.S. EPA the OEPA forwarded their technical adequacy comments. In a letter dated December 29, 1983, to the Respondent U.S. EPA detailed the technical adequacy comments made by OEPA, and requested a response within 30 days.

29. In a letter dated January 30, 1984 to U.S. EPA, the Respondent requested several more weeks to complete its submittal.

30. In a letter dated May 15, 1984, to the Respondent, OEPA requested that the information be submitted by May 31, 1984, to address each deficiency;



in the absence of an acceptable response, OEPA would recommend denial of Respondent's Part B application and termination of interim status.

31. In a letter dated May 31, 1984, to OEPA the Respondent submitted a response to the adequacy comments. This submittal was approximately four months late. The submittal did not fully address some of U.S. EPA's and OEPA's concerns, and others concerns were not addressed at all in the response.

32. In a letter dated July 16, 1984, to the Respondent, the OEPA sent the results of another adequacy review showing that deficiencies still existed. OEPA requested review a complete response to all items by September 1, 1984. Major deficiencies listed included tank thickness testing, detailed engineering drawings for each tank, and a demonstration that containers said to have no free liquids do in fact have no free liquids.

33. In view of the above, the Respondent has failed to submit the information in full as required by 40 CFR 270.10(a) and 40 CFR 270.10(e)(4).

ORDER AND CONDITIONS  
FOR CONTINUED OPERATION

Respondent having been initially determined to be in violation of 42 U.S.C. §6925, the following Compliance Order pursuant to 42 U.S.C. §6928(a)(1) is issued.

IT IS HEREBY ORDERED that Respondent, Hukill Chemical Corporation, shall perform the following:

A. Respondent shall within forty-five (45) days of receipt of this Complaint cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal at the facility as shall be in complete compliance with the applicable Ohio Hazardous Waste Rules, OAC 3745-65-01 through 3745-69-30.

B. Respondent shall within forty-five (45) days of the receipt of this Order submit a closure plan as specified in OAC 3745-66-10 through 3745-66-20. The closure plan shall address, but not necessarily be limited to, the following items:

(1) Sample locations, depths, and techniques for collecting surface and subsurface soil samples to define the extent of soil contamination both within and without the diked storage area in the solvent tank farm. Parameters selected for analysis shall reflect the types of waste stored presently and in the past in this storage area.

(2) Removal techniques, disposal or treatment options for the maximum volume of possibly contaminated soil, and associated costs.

(3) Backfilling of any removed contaminated soil with low permeability materials, removal of the stand pipes in the northeast and southwest corners of the tank farm, installation of an automatic system for dewatering purposes, and a means to prevent overtopping of the tanks.

(4) Installation of groundwater monitoring wells in locations and at depths suitable to determine the possible impact of the solvent tank farm on groundwater quality. Parameters selected for analysis shall reflect the types of waste stored presently and in the past in this storage area.

(5) Closure of the underground hazardous waste storage cistern. This shall include plans for certification by a professional engineer that all floor drains in the active portion of the facility which connect to the underground system are permanently sealed.

(6) Demonstration of financial assurance that the closure plan can be carried out as specified.

(7) All of the above items shall be submitted with an implementation schedule. Once the plan is approved by U.S. EPA and OEPA, the Respondent shall comply with the approved schedule and submit proof to U.S. EPA and OEPA of meeting all dates contained in such schedule.

C. Respondent shall within five (5) days of receipt of this Order achieve compliance with the following requirements:

(1) Provide adequate aisle space in the drum storage areas pursuant to OAC 3745-65-35.

(2) Store all hazardous waste in containers which are in good condition pursuant to OAC 3745-55-71.

D. Respondent shall, within fourteen (14) days of receipt of this Order, submit an adequate response to each of the technical comments made by U.S. EPA and OEPA to date in the Part B review process and required pursuant to 40 CFR 270.10(a) and (e)(4).

E. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the times stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Mr. Ron Lillich, RCRA Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Richard Shank, Office of Hazardous Materials Management, Ohio Environmental Protection Agency, 361 East Broad Street, Columbus, Ohio 43216.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above, and pursuant to Section 3008(c) and (g) of RCRA, the U.S. EPA assesses a penalty of FORTY-TWO THOUSAND ONE-HUNDRED & TWENTY-FIVE DOLLARS (\$42,125) against the Respondent. The proposed penalty has been set at the indicated level based upon a analysis of the potential for harm and the extent of deviation from the requirements. Other factors which may be considered in the penalty calculation include: effect of economic benefit of noncompliance, good faith efforts to comply/lack of good faith, degree of willfullness and/or negligence, history of noncompliance, ability to pay, and other unique factors. Payment shall be submitted within 60 days of entry of this ORDER, in the form of a certified or cashier's check made payable to the Treasurer of the United States of America and remitted to Ms. Mary Langer, Regional Hearing Clerk, U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604.

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent is hereby notified that the above Order shall become final unless said Respondent has requested in writing a hearing on the Order no later than 30 days from the date this Order is served. You have the right to request a hearing to contest any factual allegation set forth in the Complaint or the appropriateness of any proposed compliance schedule or penalty. In the event that you wish to request a hearing, and to avoid having the Compliance Order become final without further proceedings, you must file a written answer to this Complaint with the Regional Hearing Clerk, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of your receipt of this Notice. A copy of this answer and any subsequent document filed in this action should also be sent to David M. Taliaferro, Assistant Regional Counsel, at the same address.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which you have knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue in the hearing. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing.

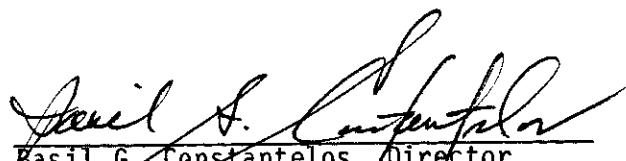
The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits are applicable to this administrative action.

SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may confer informally with U.S. EPA concerning (1) whether the alleged violations in fact occurred as set forth above, (2) the appropriateness of the compliance schedule, and (3) the appropriateness of any proposed penalty in relation to the size of your business, the gravity of the violations, and the effect of the proposed penalty on your ability to continue in business.

You may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect the thirty day time limit for responding to this Complaint or requesting a formal hearing on the violations alleged herein. U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. Request for an informal conference should be made in writing to Mr. Ron Lillich, Waste Management Division, at the address cited above, or by calling him at (312) 886-4460.

DATED this 24<sup>th</sup> day of December, 1984.

  
Basil G. Constantelos, Director  
Waste Management Division  
U.S. Environmental Protection Agency  
Region V

## RCRA ENFORCEMENT ACTION SIGN-OFF

## PART I. BACKGROUND

FACILITY NAME Hukill Chemical Corporation  
 FACILITY LOCATION 7013 Krick Road Bedford, Ohio  
 RCRA ID NUMBER OHD 001-926-740  
 NATURE OF VIOLATION Soil/groundwater contamination,  
drum storage, and failure to meet Part B deadlines.  
 ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER NPDES referral?  
 AIR \_\_\_\_\_  
 OTHER \_\_\_\_\_

PART II. RECOMMENDATION Issue order

## PART III. CONCURRENCES ON DRAFT

Please include penalty calculation  
 sheet in future drafts - WEM

	INITIALS	DATE	AGREE (✓)	DISAGREE ( )
PREPARER TECHNICAL	<u>RAJ</u>	<u>9/19/84</u>	(✓)	( )
CHIEF, STATE TECHNICAL UNIT	<u>DSB</u>	<u>9/19/84</u>	(✓)	( )
Act CHIEF, TP&C SECTION	<u>WEM</u>	<u>9/24/84</u>	(✓)	( )
ASSISTANT REGIONAL COUNSEL	<u>DMT</u>	<u>11/21/84</u>	(✓)	( )

NAME & DATE OF STATE CONTACT NOTIFIED \_\_\_\_\_

## PART IV. APPROVAL

1. PREPARER TECHNICAL	<u>RAJ</u>	<u>12/18/84</u>	(✓)	( )
2. CHIEF, STATE TECHNICAL UNIT	<u>TBB</u>	<u>12/19/84</u>	(✓)	( )
3. CHIEF, TP&C SECTION	<u>TBB</u>	<u>12/19/84</u>	(✓)	( )
4. CHIEF, WASTE MAN. BRANCH	<u>DMT</u>	<u>12/20/84</u>	(✓)	( )

## OFFICE OF REGIONAL COUNSEL

5. ASSIST. REG. COUNSEL	<u>Heuberger Taliaferro</u>	<u>12/20/84</u>	( )	( )
6. CHIEF, SOLID WASTE & EMER. RESPONSE BR.	<u>mb</u>	<u>12/20/84</u>	(X)	( )
7. REGIONAL COUNSEL	<u>RAJ</u>	<u>12/20/84</u>	( )	( )
DIRECTOR, WASTE MAN. DIV.	<u>RAJ</u>	<u>12/20/84</u>	( )	( )

cc: Section Log  
 ORC

RAJ





## INTER-OFFICE COMMUNICATION

TO: Ron Lillich, U.S. EPA - Region V  
DATE: September 6, 1984  
FROM: Kris Coder, <sup>KC</sup> Ohio EPA, N.E.D.O., DSHWM  
SUBJECT: Hukill Chemical Corporation - #02-18-0315, OHD 001-926-740

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On August 27, 1984, I received a letter from Rob Hukill responding to my July 24th comments concerning the Hukill ISS inspection of July 10. In the letter, Rob Hukill indicated that the required isle space had improved in the north sector of the East Warehouse and that the drum inventory had been reduced from 985 to 579. I was invited to observe this at my convenience.

On August 28, 1984, I visited the facility and observed the following:

1. The isle space in the north sector had improved since the date of the ISS inspection.
2. It was evident that the drum storage had also been reduced.

I asked Rob Hukill how his response to our comments were coming. He indicated that Hukill's response would be forthcoming. Some of his comments were as follows:

1. One empty tank has been solely dedicated for emergency spill clean-up.
2. A final decision on a new improved security (alarm) system has not been made yet. The decision is forthcoming in about one week. Hukill will respond to me in a letter giving more details on the system.
3. Said he would include as treatment in the Part B application the mixing of the lime and drum solids that is occurring in East Warehouse.

KC:kr

cc: Paula Cotter, DSHWM, Central Office  
Milton Rinehart, DSHWM, Central Office

*Alcan*



# HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146 • 216/232-9400

*Over Thirty-Five Years of Quality Products and Services*

August 24, 1984

Mr. Kris L. Coder  
Environmental Scientist  
OEPA-NEDO-DSHWM  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

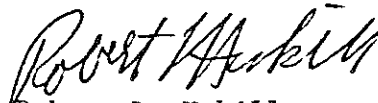
Dear Mr. Coder:

I am pleased to report that we have the required aisle space between the palletized stacks of Hazardous Waste Drums in the East Warehouse. We have also reduced our drum count from 985 to 579.

If you wish to observe this, I would be happy to be available for a tour at your convenience.

Very truly yours,

HUKILL CHEMICAL CORPORATION



Robert L. Hukill  
Vice President  
General Manager

RLH/sj





Re: Hukill Chemical Corporation  
Cuyahoga County  
#02-18-0315

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Attn: Robert Hukill

RECEIVED  
JUL 27 1984

July 24, 1984

WASTE MANAGEMENT  
BRANCH

Dear Mr. Hukill:

On July 10, 1984, David Wertz, Ron Lillich and this writer conducted a hazardous waste inspection of Hukill Chemical Corporation located at 7013 Krick Road. You, David Marlin and Robert Lang represented this facility during the inspection. The facility was inspected for compliance with both State and Federal regulations for the handling of hazardous wastes.

The following violations and/or concerns were noted during this inspection:

<u>Description of Violation or Concern</u>	<u>Regulation</u>
1. The facility must maintain adequate isle space in the north sector of the east warehouse.	OAC 3745-65-35

We appreciate the efforts that your company has made to considerably reduce the drum inventory to below the allowable permitted levels. You indicated that with your more efficient processing methods, it should not be too difficult to keep the drum inventory below 1000.

The diking and ramping for secondary containment in the east warehouse looked very good. You gave us assurances that the isle space in the east warehouse, especially on the north side, would be improved when the cement equipment is removed. Also, we noticed evidence of a leaking drum in this area. Immediate action should be taken to contain any spills.

You mentioned that an improved security system is being planned for completion by September. I would like to be notified of the above improvements when they occur so that I can schedule another visit.

Finally, during the inspection, I did not evaluate your compliance with financial responsibility requirements. These items will be handled separately.

Please submit documentation for corrections of these above violations and concerns to my attention at the Ohio EPA, Northeast District Office, within 30 days after receipt of this letter.

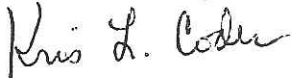
Re: Hukill Chemical Corporation  
Mr. Robert Hukill  
Page 2

July 24, 1984

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Solid and Hazardous Waste Management.

Please advise me if you have any questions.

Yours truly,



Kris L. Coder  
Environmental Scientist  
Division of Solid and Hazardous Waste Management  
Northeast District Office

KLC:kr

Enclosure

cc: Paula Cotter, DSHWM, Central Office  
✓ Ron Lillich, U.S. EPA - Region V, Chicago

Re: Hukill Chemical Corporation  
#02-18-0315  
Cuyahoga County

STATUS 0

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

OHR 001 926 740 July 7, 1983

Attn: Robert L. Hukill

Dear Mr. Hukill:

Thank you for your letter of June 20, 1983, indicating that the deficiencies noted in my inspection of May 10, 1983, had been corrected. The facility now appears to be in compliance with the applicable State and Federal hazardous waste regulations.

Should you have any questions in the future, please do not hesitate to contact this office.

Sincerely,

David N. Wertz  
Environmental Scientist  
Division of Hazardous Materials Management

DNW:km

cc: Paula Cotter, Div. of Hazardous Materials Management, Central Office  
✓ Ken Westlake, U.S. EPA - Region V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

*status 3*  
*Paul -*  
*STAT CODE*  
*PLEASE - March 1, 1983*  
Date: JUN 29 1983

*To Compliance file*

Subject: Hukill Chemical Corporation, Bedford, Ohio  
State ISS Inspection EPA ID # OHD 001 926 740

From: James Brossman, Hydrologist *James Brossman*  
STU #2

To: Daniel Banaszek, Chief  
STU #2

Attached of a copy of an inspection form completed by representatives of OEPA on April 28, and May 10, 1983, for the subject facility.

The State inspection report shows no substantial violations of the interim status standards at this facility. However, when Rick Karl and I visited Hukill on March 1, 1983, a number of violations were noted, including:

1. Inadequate aisle space (i.e. no aisle space)
2. Storage of hazardous waste in uncovered containers.
3. The facility has exceeded their contain storage capacity of 55,000 gallons by approximately 137,500 gallons.
4. Listed hazardous wastes are shipped off-site (for use as boiler fuel) without a manifest.
5. The company mixes paint solids and other drum heels with the still bottoms from their solvent reclamation process. This mixture is then shipped off-site as supplemental fuel. In my opinion these solids have little, if any, heating value, and the mixture of these solids with the still bottoms is disposal.
6. Hukill's still bottom mixture or "Chem-fuel" has approximately 20,000 ppm chlorine. The lowest grade of fuel oil (No. 6) has about 31 ppm chlorine. According to U.S. EPA guidance, if waste derived fuels contain significant quantities of low energy organic contaminants not ordinarily found in virgin fuels or waste oil then the burning of these fuels is probably not legitimate recycling.

I plan to visit Hukill the week of July 11, 1983.

cc: Babette Neuberger



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: MAY 19 1983

SUBJECT: Hukill Chemical Corporation, Bedford, Ohio  
Anticipated Enforcement Action

FROM: Babette J. Neuberger *BW 5/19/83*  
Assistant Regional Counsel

TO: Catherine McCabe, Department of Justice  
Dennis Zapka, Assistant U.S. Attorney  
Jerry Muys, Assistant Enforcement Counsel, EPA HQ  
Caroline Popplin, Assistant Enforcement Counsel, EPA-HQ

Enclosed please find David Wirtz' report of his interim status standards (ISS) inspection at the Hukill facility. According to Mr. Wirtz' report, the company does not have any substantial interim status violations at the facility.

During the week of May 16, 1983, Dave Wirtz and Tom Carlisle of Ohio EPA, will discuss the sham recycling issue with Jim Brossman, U.S. EPA. By May 25, 1983, Jim Brossman will make a recommendation to my office about prosecuting Hukill for violation of the sham recycling regulations.

I would like to meet with Dennis, Catherine, Jerry and Caroline during the week of May 30, 1983, to discuss evidentiary matters and the nature of the cause of action against Hukill.

Please call me to establish a convenient meeting date and location. Thank you.

Enclosure

status 3  
**Ohio EPA**

Re: DHMM  
Hukill Chemical  
Cuyahoga County  
#02-18-0315

OHID 001 926 740

Hukill Chemical  
7013 Krick Road  
Bedford, Ohio 44146

May 19, 1983

Attn: Robert Hukill

Dear Mr. Hukill:

This office has conducted two meetings/inspections recently with your staff. On April 28, 1983, your staff met with Melinda Merryfield-Becker and myself from the Northeast District Office and with Tom Carlisle and Milton Rinehart from our Columbus office. On that date, we discussed our early review comments on your Part B application submittal. On May 10, 1983, I returned to complete the Interim Status Inspection. You and Bob Lang met with me on May 10th and on April 28th, Dave Marlin and Howard Akin of your staff participated in the meeting.

This letter addresses only the results of the inspection of your facility for compliance with State and Federal regulations for the handling of hazardous wastes. Detailed comments of our Part B review will be sent at a later date.

The following violations and/or concerns were noted during this inspection:

<u>Description of Violation or Concern</u>	<u>Regulation</u>
1. A log must be kept to record inspections of the loading and unloading areas.	40 CFR Part 265.15 (b)(4) OAC 3745-65-15 (B)(4)
2. The operating record must be modified to include some additional areas required by the regulations.	40 CFR Part 265.73 (b)(1) OAC 3745-65-73 (B)(1)
3. The tank inspection form must be modified to include all areas required by the regulations.	40 CFR Part 265.194 OAC 3745-66-94

Please submit documentation for corrections of these above violations to my attention at the Ohio EPA, Northeast District Office, within 30 days after receipt of this letter.

In addition to the above concerns, an inventory you conducted at the end of April indicated there are now 4,200 drums on-site. We understand you are beginning to have the drummed solid materials landfilled and will have the inventory below the 1000 drums allowed by your hazardous waste permit. If

Re: Hukill Chemical  
#02-18-0315

May 19, 1983

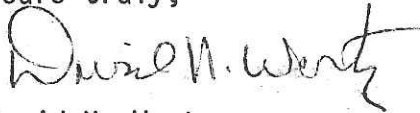
Page 2

your Final permit is written prior to August, it may contain a compliance schedule requiring the reduction of your drum inventory to permitted levels.

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Jim Mayka of U.S. EPA - Region V.

Please advise me or Jim Mayka at (312) 886-7443 if you have any questions.

Yours truly,



David N. Wertz  
Environmental Scientist  
Division of Hazardous Materials Management  
Northeast District Office

DNW:km

Enclosure

cc: Paula Cotter, DHMM, Central Office  
Ken Westlake, U.S. EPA - Region V

### HUKILL CHEMICAL

- #1 - Although the loading areas are used daily and are in an area of constant work activity, no formal log is kept noting the inspection of the area.
- #2 - An inventory of each storage area is now kept, but some of the required information about the waste is not on the current form used. The current method does include the customer identification and manifest numbers.
- #3 - Records are kept daily on the tank levels, but other information required by the daily inspection is not on the current inspection log.

JAN 20 1983

Mr. Dennis P. Zapka  
Assistant U.S. Attorney  
1404 East 9th Street  
Suite 500  
Cleveland, Ohio 44114

Re: Hukill Chemical Corporation  
Bedford, Ohio

OHD 001 926 740

Dear Dennis:

EPA-Region V has completed its review of Hukill Chemical Corporation's proposed consent agreement and hydrology report on the study that was performed at the site. A copy of the report is enclosed for your reference. We find that further study is necessary to determine the nature and extent of contamination at the facility. In addition, Region V remains committed to entry of a civil consent decree in this matter.

We would like to meet with the company and its consultant, Donna Wallace of NUS Corporation, by mid-February to discuss the hydrology report and to force our lengthy negotiations to a close.

Based on a review of the NUS Report, Region V's hydrogeologists, Rick Karl and Jim Brossman, recommend further study of the tank farm area to determine the nature and extent of contaminants that may be flowing from the area. The hydrology report states that chemical solvents in the tank farm have most likely contaminated subsurface soils in the area to a depth of 2.5 feet. (Dan Watson, EPA-Eastern District Office has suspected this all along.) Brossman and Karl recommend that the study includes soil borings to a depth of three feet immediately outside of the bermed tank farm to determine if chemicals have migrated underneath and beyond the earthen berm. They suggest that chemicals from the tank farm area may be contributing to the elevated levels of Total Organic Carbons (TOC) in groundwater well G-3. Groundwater well G-3 had a "statistically significant increase" in TOC, a trace parameter, over background levels. That well is located downgradient of the tank farm and reflects the quality of the water that is discharged to the stream.

If contaminated soils near the tank farm are degrading, or contributing to, the degradation of the groundwater, the soils will have to be removed. Under the RCRA program, groundwater contamination is defined as "a statistically significant increase in chemical contaminants over background".

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JAN 24 1983  
WASTE MANAGEMENT BRANCH  
EPA, REGION V



The NUS Report compares the groundwater and surface water data collected at the site to EPA's Drinking Water Standards and SNARL's. The report concluded that because Hukill's operations have not caused those standards and levels to be exceeded in the stream, the facility's operations do not pose an environmental threat. Region V cannot accept this premise.

Donna Wallace also contends that the tank farm area is not causing the elevated TOC levels in groundwater well G-3. While she states that the two standpipes in the tank farm create a conduit for solvents to enter the groundwater, the report concludes that due to the estimated groundwater flow rate for the area, chemicals from the tank farm could not be contributing to the elevated TOC levels in well G-3. Hukill's consultant estimates that it would take over 400 years for the chemicals to travel the distance between the tank farm and well G-3. Brossman and Karl say that there is insufficient data to either support or refute the groundwater flow estimates in the report. Donna Wallace attributes the elevated TOC levels in well G-3 to a natural organic layer of material that was intersected during the well-drilling. EPA's hydrologists believe that if the wells were properly cased and bailed before sampling, the subsurface strata would not affect the groundwater quality.

I would like to discuss our negotiating strategy for the February meeting with you after you have had an opportunity to review the NUS Report. Specifically, I would like to discuss a cut-off date for our negotiations. I believe that if we do not have a signed decree by the end of February we should end our discussions with the company and initiate litigation.

Very truly yours,

Babette J. Neuberger  
Assistant Regional Counsel

Enclosure

cc: David Hird  
Department of Justice

Elise DiBiaggio-Wood  
EPA-HQ

bcc: Grimes/Anderson/Ullrich/Schaefer  
Karl/Brossman/Acierto ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: DEC 10 1982  
SUBJECT: Hukill Chemical Corporation,  
Bedford, Ohio  
FROM: Babette J. Neuberger *BON 12/14/82*  
Assistant Regional Counsel  
TO: Addressees

On December 8, 1982, Hukill Chemical Corporation sent me a proposed consent agreement in response to the proposed Consent Decree which I circulated for their review and comment on October 14, 1982. The company's proposed agreement substantially modifies the document which we circulated in October. I have attached a copy of the company's proposal to this memo.

An analysis of the company's proposal reveals the following discrepancies between the two documents:

First: The company proposes an administrative settlement rather than a civil consent decree;

Second: The company views the goal or purpose of its hydrological investigation, and any remedial action, as the reduction of off-site transport of pollutants from the facility.

Accordingly, the company's document omits any obligation on the part of Hukill to a) define the area and extent of contamination at the facility; b) to perform soil contamination studies; c) to remove contaminated soils from the facility; d) to decontaminate the buried cistern; or e) to prevent further groundwater and surface water contamination at the facility.

In contrast, EPA has stated that its goal is to have the company perform the studies and remedial actions necessary to remove contaminated soils from the facility; decontaminate the buried cistern, and prevent further groundwater and surface water contamination; in addition to preventing the migration of pollutants off-site via the groundwater.

Third: EPA's proposed consent decree establishes EPA as the body responsible for the ultimate determination of whether further investigative work is necessary at the site, beyond the present hydrological investigation; and also whether contaminants are present at the site which require remedial action.

The company's proposal deletes any reference to EPA as the decision-making body. Their proposal fails to identify how these issues will be resolved, and, therefore, renders the document unenforceable.

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DEC 13 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

A middle approach should be negotiated, which establishes EPA as the initial determining body, and grants Hukill the right to appeal EPA's initial decision. In order to negotiate this mechanism, however, both parties must reach a technical consensus on their stated goals for the site.

Fourth: The company's proposal adds a requirement that EPA and Hukill meet within ten days of submittal of the company's hydrogeologic investigation report to determine the general content and schedule of a remedial action plan to reduce off-site transport of pollutants from the facility.

Fifth: The company's proposal modifies reporting requirements from "twice monthly" to "within two weeks of each milestone set forth in agreement."

Sixth: The company's proposal deletes a requirement which would place the burden on Hukill to prove that any delay caused in performing its required activities was caused by circumstances entirely beyond its control.

I would like to meet with Leon Acierto, Water Quality Branch, and Rick Karl and Jim Brossman, Waste Management Branch, to discuss our response to Hukill's proposal. Jim Brossman has taken over responsibility from Rick Karl for writing the facility's RCRA permit.

At the meeting I would like to discuss the following:

1. Is the Waste Management Branch still concerned about outside soil contamination and decontamination of the buried cistern, in addition to migration of pollutants off-site?
2. If the answer to the above is yes, has Jim Brossman required decontamination of the soils and cistern as part of his RCRA permitting requirements?
3. What chemical concentrations did Hukill find in its first round of groundwater sampling?
4. How "clean" is "clean" groundwater? How does Waste Management Branch define "contamination" at the facility?
5. Does "zero discharge" from outfall 001 include "no rainwater discharge"?
6. If rainwater will still be discharged through outfall 001 after the company has achieved "zero discharge", how "free" of priority pollutants does the discharge have to be?

7. What are the respective positions of the Water Division and the Waste Management Division about administrative versus civil court resolution to this matter?

I would like to meet to discuss the above before Christmas, if possible. Please let me know if you can meet on December 22, 23 or 24. I can be reached at 886-6730.

Addressees: Leon Acierto, 5WQC  
Ed DiDomenico, 5WQC w/out attachment  
Rick Karl, 5HW  
Jim Brossman, 5HW ✓  
Bill Miner, 5HW, w/out attachment  
Dennis Zapka, Assistant U.S. Attorney  
Roger Grimes, 5C, w/out attachment  
Robert Anderson, 5C w/out attachment

### CONSENT AGREEMENT

WHEREAS, Hukill Chemical Corporation (hereinafter referred to as "Hukill") is an Ohio corporation which owns and operates a chemical solvent reclaiming and acid blending and packaging company at 7013 Krick Road, Bedford, Ohio; and

WHEREAS, the Environmental Protection Agency of the United States of America (hereinafter referred to as "EPA") is responsible for administering and enforcing, inter alia, the Federal Water Pollution Control Act and the Solid Waste Disposal Act; and

WHEREAS, EPA has alleged certain violations of the above-referenced statutes by Hukill; and

WHEREAS, Hukill does not admit any violations of either above-referenced statute; and

WHEREAS, the parties agree that settlement of this matter is in the public interest and that entry of this Agreement without litigation is the most appropriate means of resolving this matter;

NOW, THEREFORE, the parties hereto agree as follows:

#### I.

Nothing contained in this Consent Agreement shall be construed as an admission by Hukill of any violations of the Federal Water Pollution Control Act or of the Solid Waste Disposal Act, and nothing contained in this Consent Agreement shall be construed to limit any defenses Hukill may raise in any enforcement action or administrative proceeding.

#### II.

The provisions of this Consent Agreement apply to and are binding upon the parties herein, their officers, directors, agents, servants, employees and successors.

### III.

That Hukill shall, by August 23, 1982, submit a plan and implementation schedule to be approved by U.S. EPA for determining the nature and extent of the contamination, if any, resulting from the facility's storage and disposal practices. The plan shall include, among other things, a hydrogeologic investigation of the facility to determine groundwater quality, flow rate, and direction; and surface water quality. Groundwater and surface water samples shall be analyzed for COD, TOC, pH, chloride, heavy metals, volatile organic pollutants included on the U.S. EPA priority pollutants list, and other significant organic pollutants identified by Hukill in its waste analysis plan, including total organic halogen.

### IV.

That Hukill shall commence a hydrogeologic investigation at the facility on September 13, 1982, in accordance with the plan that was submitted to U.S. EPA on August 23, 1982, by Hukill's consultant NUS Corporation, and approved by U.S. EPA, as modified on September 2, 1982. The investigation shall be completed in accordance with the approved implementation schedule.

### V.

That within thirty days of completion of the hydrogeologic investigation identified in paragraph III., Hukill shall submit to EPA a report which details results of the hydrogeologic investigation.

### VI.

That within ten days of submittal of the report identified in paragraph V., or at some later agreed upon date, Hukill shall meet with EPA to discuss the results of the hydrogeologic investigation and to determine the general content and schedule for submission of the Plan and Implementation Schedule identified in subparagraph VIIa.

## VII.

a. That Hukill shall submit a Plan and Implementation Schedule to be approved by EPA for the remedial actions deemed necessary to reduce the off-site transport of pollutants at the facility, if contamination is present at the site.

b. Said Plan and Implementation Schedule identified in subparagraph VIIa. may include provisions for further sampling and analysis or soil testing, if determined to be necessary.

c. Said Plan shall include a technical justification for installation of a reverse well-head pumping system at the buried cistern to collect leachate, if this remedial action is proposed by Hukill. The explanation shall be sufficiently detailed to document the efficacy of the project.

## VIII.

Hukill shall conduct remedial action upon approval by EPA of the Plan identified in paragraph VII above, and in accordance with the implementation schedule.

## IX.

That within thirty (30) days of completion of the hydrogeologic investigation identified in paragraph III., Hukill shall:

- a. Submit a detailed description of corrective measures to be taken for achieving compliance with permit limitations for outfalls 001 and 601 and the elimination or treatment of all unauthorized discharges, including priority pollutants. A timetable to be approved by EPA for achieving compliance with permit limitations shall accompany the description. A schematic diagram of any proposed treatment or control system shall be included.
- b. Conduct remedial action upon approval by EPA of the Plan identified in subparagraph IXa., and in accordance with the approved implementation schedule.
- c. Submit a monitoring plan and timetable to be approved by EPA for confirming effective treatment or elimination of unauthorized discharges, including priority pollutants. The Plan shall include sample type, frequency and analytical protocols.

- d. Resubmit NPDES Renewal Form 2c if zero discharge at outfall 001 is not achieved following completion of all corrective measures identified pursuant to subparagraph IXa.
- e. Submit a written explanation of the cause(s) of instances of noncompliance with the FWPCA and permit limitations for BOD and TOC. The statement shall explain the presence of substantial quantities of any organic priority pollutants in the outfall 001 discharge.

#### X.

Hukill shall by September 5, 1982, provide, in writing, accurate information concerning the subject facility as follows:

- a. A current plot plan showing the location(s) of all point source discharges, as defined in the Federal Water Pollution Control Act, to navigable waterways.
- b. An accurate description of the significant manufacturing operations currently occurring in the plant; identifying all major unit operations and associated plant equipment.
- c. A current simplified flow diagram of the total water system showing all significant wastewater sources (process, cooling, floor drains, sanitary, storm and miscellaneous), wastewater treatment methods, collection systems and flow path(s) from the source(s) to the receiving water. All significant parameters including hydraulic flows should be identified for each discharge point.
- d. An assessment of the facility's compliance with pretreatment requirements imposed by the Walton Hills sewer authority and/or the United States Environmental Protection Agency. If current practices are not in conformance with said regulations, a detailed description of corrective measures and implementation dates to achieve compliance shall be provided.

#### XI.

EPA agrees to waive civil penalties for past violations in consideration of Hukill's performance of the terms of this Consent Agreement. Failure of Hukill to comply with the Agreement, absent causes beyond Hukill's control, shall constitute an automatic revocation of EPA's agreement not to seek civil penalties for past violations.



Hukill acknowledges that it has been advised that EPA asserts that failure to comply with the terms of this Agreement may subject Hukill to civil penalties of not more than \$25,000.00 for each day of continued noncompliance with the terms of this Agreement pursuant to §3008(a) of the Solid Waste Disposal Act, as amended, 42 U.S.C. §6928; and that EPA asserts that Hukill may be subject to civil penalties of not more than \$10,000.00 per day for each day of continued noncompliance with terms of this Agreement pursuant to §309 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §1319.

## XII.

Hukill's time for achieving compliance as set forth in this Agreement may be extended upon the occurrence of, and to the extent of any delay caused by circumstances entirely beyond its control.

A. If any event occurs which causes or may cause delays in achieving compliance at Hukill's facility as provided in this Agreement, Hukill shall notify EPA in writing within 15 days of the event, describing in detail the anticipated length of the delay, the precise cause or causes of the delay, the measures taken and to be taken to minimize any such delays and the timetable by which those measures will be implemented. Hukill shall adopt all reasonable measures to avoid or minimize any such delay.

B. If the parties agree that the delay or anticipated delay in compliance with this Agreement has been or will be caused by circumstances entirely beyond the control of Hukill, the time for performance hereunder may be extended for a period no longer than the delay resulting from such circumstances.

XIII.

Hukill shall submit progress reports within two weeks of each milestone set forth herein on the status of compliance with this Agreement. The progress reports must describe actual progress with the schedules for compliance contained in this Agreement and in approved plans and timetables submitted pursuant to paragraphs III, IV and V of the Agreement.

XIV.

All reports, notices, plans and other information that must be submitted in satisfaction of a requirement of this Agreement shall be submitted to:

U.S. Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604  
Attention: Office of Regional Counsel

At Hukill's request, any information submitted pursuant to the Agreement, (other than public information) which the Regional Administrator of U.S. EPA determines to constitute methods, processes, or other business information entitled to protection as trade secrets, shall be maintained as confidential or as trade secrets in accordance with 40 C.F.R. Part 2. A request for confidential treatment must be made when the information is provided or Hukill shall be deemed to have waived any rights to such treatment.

XV.

Nothing contained herein shall be construed so as to relieve Hukill of its obligations to submit a timely Part B permit application for a Hazardous Waste Management Permit under Section 3005, of the Solid Waste Disposal Act, 42 U.S.C. §6925, and 40 C.F.R. Part 122. Hukill shall submit a Part B permit application by September 30, 1982.

XVI.

EPA reserves the right to take other legal or equitable action as it deems appropriate and necessary to enforce subsequent violations of the Federal Water Pollution Control Act and the Solid Waste Disposal Act, and/or to approve and issue permits under the National Pollutant Discharge Elimination System Permit Program and Hazardous Waste Management Permit Program.

FOR UNITED STATES E.P.A.

FOR HUKILL CHEMICAL CORPORATION

By: \_\_\_\_\_  
Valdas V. Adamkus  
Regional Administrator  
Region V  
U.S. Environmental Protec-  
tion Agency

By: \_\_\_\_\_  
Robert L. Hukill  
Vice President



910 CLOPPER ROAD  
GAITHERSBURG, MARYLAND 20878  
(301) 258-6000

November 22, 1982  
GEC-82-440-EP

RECEIVED

NOV 24 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

Mr. Richard Karl  
Waste Management Branch  
USEPA, Region V  
230 South Dearborn Street  
Chicago, IL 60604

Dear Mr. Karl:

This letter will acknowledge the following agreements reached through our discussions on November 16 and 17:

1. The meeting between USEPA and Hukill Chemical Corporation to discuss the results of the hydrogeologic study and recommended actions will be held at some date after the Holidays.
2. Additional samples were collected at the Hukill Chemical facility on November 18 from outfall 001 and the water in vertical standpipes in the NE and SW corners of the tank farm. These samples will be analyzed for all the same parameters as past samples except for total organic halogen (dictated by laboratory availability for TOX testing).
3. The report of the findings of the hydrogeologic study will be submitted to USEPA on December 17, 1982.

If you should have any comment, please feel free to call me at (301) 258-8646.

Sincerely,

*Donna Wallace*

Donna Wallace  
Chief Hydrogeologist

cc: Robert Hukill  
Babette Neuberger  
Mark Wallach

/sd

## RECORD OF COMMUNICATION

X Phc

Call

Conference

TO:

Neuberger

FROM:

Mark Wallach, Atty. for  
Hukill Chemical Corp.

DATE: 11/4/82

TIME: 3:30p.m.

SUBJECT:

Proposed consent decree with Hukill Chemical Corporation

## SUMMARY OF COMMUNICATION:

Proposed consent decree of EPA was reviewed by Rob Hukill and Consultant Donna Wallace of NUS; and they had the following comments:

1. Decree as written is not consistent with her understanding of technical work to be done at site;
2. Source of ~~buried~~<sup>problem</sup> waste is most likely tank farm area rather than buried cistern, therefore, doubts company will install "reverse well-head pumping system"
3. First round of sampling did not indicate extensive contamination
4. She expects 2d round of sampling any day
5. Wallach found certain legal clauses too ambiguous and open-ended.

Wallach will send me a counter-proposed consent decree incorporating their legal and technical views of the case within the next week to ten days. Wallach appears to be willing to go through with signing a consent decree if we can iron out the above matters.

Wallach wants to see copy of the complaint to be filed.

RECEIVED

NOV 8 1982

WASTE MANAGEMENT BRANCH

## CONCLUSIONS; ACTION TAKEN OR REQUIRED

Conclusion: The majority of the disputed items noted above are most likely problems with terminology; or a failure of Neuberger to completely understand the technical agreements reached between Wallace and Rick Karl. I believe we will be able to iron out disagreements and get decree on file in relatively short time.

I will transmit copy of complaint to Wallach upon receipt of their counter-proposal if it looks reasonable.

INFORMATION SENT TO: Karl/Acierto/Walker/file

OCT 14 1982.

SCE-16

Mr. Mark Wallach  
Calfee, Halter & Griswold  
1800 Central National Bank  
Cleveland, Ohio 44114

Re: Hukill Chemical Corporation

Dear Mr. Wallach:

I am enclosing a proposed consent decree for the approval and signature of Hukill Chemical Corporation. The proposed decree memorializes the technical agreements which were reached between representatives of Hukill Chemical Corporation and the U.S. Environmental Protection Agency during meetings of May 17, 1982, July 15, 1982, August 12, 1982, and September 2, 1982.

I am available to discuss the language of the decree during the last week of October, and the first week of November.

Very truly yours,

Babette J. Neuberger  
Assistant Regional Counsel

cc: Dennis P. Zapka  
Assistant U.S. Attorney

bcc: w/incl  
Leon Acierto  
5WQC-13

Rick Karel  
5HB-TUB

RECEIVED

OCT 19 1982

WASTE MANAGEMENT BRANCH  
EPA REGION V

**OhioEPA**

Re: Hukill Chemical  
02-18-0315

**RECEIVED**

SEP 30 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

September 28, 1982

U.S. EPA - Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Attn: Rick Karl

Dear Rick:

This information was given to me by Melinda Becker who felt it might be useful to you in the work with Hukill Chemical.

Please keep me updated on the agreements reached with Hukill, as I will be working with them concerning their RCRA activities and their State Hazardous Waste Permit.

Yours truly,

*David N. Wertz* <sub>DNW</sub>

David N. Wertz  
Environmental Scientist  
Division of Hazardous Materials Management

DNW:km

Enclosures



# Water Management, Inc.

2480 BROADWAY AVENUE  
CLEVELAND, OHIO 44115

(216) 566-8090

February 5, 1980

Ms. Melinda Merryfield-Becker  
Environmental Scientist  
Ohio EPA  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087

Dear Ms. Becker:

In response to your letter to Mr. Hukill dated January 10, 1980, here is the summary of actions taken to date. Enclosed are the analytical results from the Outfall 001 and Barrel Storage area soil.

Let us arrive at a set of priorities for compliance with the Director's Orders at the upcoming meeting. If we are sure of our goals, we cannot help but be successful in achieving them.

Sincerely,  
Water Management, Inc.

*Richard S. Kalynchuk*

Richard S. Kalynchuk  
Technical Service Specialist

RSK:sjj

## SUMMARY of ACTIONS

### Item 1.

Water Management, Inc. dye-tested all available drains in the production area on October 19, 1979. Results indicated that all floor drains in the pump room and solvent recovery area are tied into the blind sump. This sump is pumped out periodically and its contents are disposed of by a licensed incinerator operator. The "blue box" in the solvent recovery area receives once-through cooling water. This effluent is the source of organic contamination in Outfall 001. One other known source of water tied into Outfall 001 is the truck dock area sewer. When all processes in the solvent recovery area have ceased, the truck dock sewer is primarily responsible for discharges from Outfall 001. Ground water infiltration is suspected to be a major contributor to weekend discharges from Outfall 001.

Outfall 002 was not dye-tested. This outfall has been capped. Permanent sealing of this pipe is not advised due to the explosive vapors in it's immediate vicinity.

### Item 2.

The application for tie-in to a County sewer will be completed by February 8, 1980. A decision by County officials to accept this discharge is expected by February 15, 1980.

### Item 3.

The Best Management Practices report of November 8, 1979 outlines Hukill Chemical's plans to achieve a steady state barrel inventory of 250 barrels. All major suppliers of used solvents have already switched over to bulk storage and transport. The barrel storage area behind the plant (near Tank Farm B) has been phased out.

Contaminated soil surrounding the barrel storage area has been sampled and analyzed. Newco Chemical Waste Systems of Ohio has been contacted regarding the possibility of receiving responsibility for ultimate disposal.

### Item 4.

Implementation of Best Management Practices has been delayed due to the lengthy turnaround time involved in Mass Spec/G.C. analyses. Following our meeting and subsequent negotiation the general recommendations outlined in BMP will be instituted.

RSK:sjj





CYRUS WM. RICE DIVISION

## ANALYTICAL SERVICES LABORATORY

15 NOBLE AVENUE • PITTSBURGH, PA. 15205  
412-343-9200

Project No. 0 Project Mgr. CEG  
 Date Received 12-19-79 Time 9:00 A.M.  
 Date Sampled 12-18-79 Date Reported 01-24-80

Acid \_\_\_\_\_ B-N \_\_\_\_\_ Pest \_\_\_\_\_

VOA \_\_\_\_\_ GC/MS \_\_\_\_\_ A \_\_\_\_\_ B \_\_\_\_\_ V \_\_\_\_\_ P \_\_\_\_\_

WATER MANAGEMENT, INCORPORATED

Sample Source HCWW Outfall

	µg/L	µg/L		µg/L	µg/L		µg/L	µg/L
acenaphthene		<1	fluoranthene		1	acenaphthylene		
acrolein			4-chlorophenyl phenyl ether			anthracene		≤1
acrylonitrile			4-bromophenyl phenyl ether			benzo(ghi)perylene		
benzene		110	bis(2-chloroisopropyl) ether		7	fluorene		<1
benzidine			bis(2-chloroethoxy) methane		34	phenanthrene		≤1
carbon tetrachloride			methylene chloride		18000	dibenzo(a,h)anthracene		
chlorobenzene			methyl chloride			indeno(1,2,3-cd)pyrene		
1,2,4-trichlorobenzene			methyl bromide			pyrene		<1
hexachlorobenzene			bromoform			tetrachloroethylene		16
1,2-dichloroethane			dichlorobromomethane			toluene		21
1,1,1-trichloroethane		95	trichlorofluoromethane			trichloroethylene		88
hexachloroethane			dichlorodifluoromethane			vinyl chloride		
1,1-dichloroethane			chlorodibromomethane			aldrin		
1,1,2-trichloroethane			hexachlorobutadiene			dieldrin		0.01
1,1,2,2-tetrachloroethane			hexachlorocyclopentadiene			chlordan		
chloroethane			isophorone			4,4'-DDT		0.06
bis (chloromethyl) ether			naphthalene		18	4,4'-DDE		<0.01
bis (2-chloroethyl) ether			nitrobenzene			4,4'-DDD		
2-chloroethyl vinyl ether			2-nitrophenol			α-endosulfan		
2-chloronaphthalene			4-nitrophenol		<1	β-endosulfan		<0.01
2,4,6-trichlorophenol			2,4-dinitrophenol			endosulfan sulfate		
parachlorometa cresol			4,6-dinitro-o-cresol			endrin		
chloroform			N-nitrosodimethylamine			endrin aldehyde		
2-chlorophenol			N-nitrosodiphenylamine		1	heptachlor		<0.01
1,2-dichlorobenzene		17	N-nitrosodi-n-propylamine			heptachlor epoxide		<0.01
1,3-dichlorobenzene			pentachlorophenol			α-BHC		
1,4-dichlorobenzene		3	phenol		6	β-BHC		0.02
3,3'-dichlorobenzidine			bis(2-ethylhexyl) phthalate		14	T-BHC (lindane)		<0.01
1,1-dichloroethylene			butyl benzyl phthalate		3	δ-BHC		
1,2-trans-dichloroethylene			di-n-butyl phthalate		2	PCB-1242 (Arochlor 1242)		
2,4-dichlorophenol			di-n-octyl phthalate			PCB-1254 (Arochlor 1254)		0.97
1,2-dichloropropane			diethyl phthalate		1	PCB-1221 (Arochlor 1221)		
1,3-dichloropropylene			dimethyl phthalate		<1	PCB-1232 (Arochlor 1232)		
2,4-dimethylphenol		5	benzo(a)anthracene		≤5	PCB-1248 (Arochlor 1248)		1.6
2,4-dinitrotoluene			benzo(a)pyrene			PCB-1260 (Arochlor 1260)		
2,6-dinitrotoluene			3,4-benzofluoranthene			PCB-1016 (Arochlor 1016)		
1,2-diphenylhydrazine		<1	benzo(k)fluoranthene			Toxaphene		
ethylbenzene			chrysene		≤5	Xylene		

	Date Extracted	Date Injected	Conc. Factor	Standard	Book & Page No.
ACID GC					
GC/MS	12-19-79	01-02-80	1000	Consent Decree	26-79-93
B-N GC					
GC/MS	12-19-79	12-20-79	1000	Consent Decree	26-79-91
VOA GC					
GC/MS	01-08-80	01-08-80	0.1, 0.01	Consent Decree	26-79-92, 32-79-73
PE GC	12-26-79	01-4, 7-80	200	Consent Decree	36-79-34, 2-80-5

All parameters above were searched for - blank spaces indicate not detected.

\*\*<10 µg/L      \*\*\*<5 µg/L      m=GC/MS      <= Sum of two compounds not separated by the method used      A=Average

PROJ		TASK		MO	DAY	RICE		NBR		IDENT		TYPE		AMOUNT		▽	
7	10	11	12	22	25	26			33	35			47	50	54	56	63



CYRUS W.M. RICE DIVISION

ANALYTICAL SERVICES LABORATORY  
5 NOBLE AVENUE • PITTSBURGH, PA. 15205  
412-343-9200

WATER MANAGEMENT, INCORPORATED

Sample Source HCSS Barrel Storage Area

Project No. Q  
Date Received 12-19-79  
Date Sampled 12-18-79  
Rice Sample No. 14120645  
Project Mgr. CRG  
Time 2:00 A.M.  
Date Reported 01-24-80  
Acid \_\_\_\_\_ B-N \_\_\_\_\_ Pest 02-01-80  
VOA \_\_\_\_\_ GC/MS \_\_\_\_\_ A \_\_\_\_\_ B \_\_\_\_\_ V \_\_\_\_\_ P \_\_\_\_\_

	µg/L	µg/g		µg/L	µg/g		µg/L	µg/g
acenaphthene		5	fluoranthene		4	acenaphthylene		
acrolein			4-chlorophenyl phenyl ether			anthracene		
acrylonitrile			4-bromophenyl phenyl ether			benzo(ghi)perylene		≤15
benzene		18	bis(2-chloroisopropyl) ether		67	fluorene		7
benzidine			bis(2-chloroethoxy) methane		6	phenanthrene		≤15
carbon tetrachloride			methylene chloride		67	dibenzo(a,h)anthracene		
chlorobenzene		3	methyl chloride			indeno(1,2,3-cd)pyrene		
1,2,4-trichlorobenzene		2	methyl bromide			pyrene		7
hexachlorobenzene			bromoform			tetrachloroethylene		25
1,2-dichloroethane			dichlorobromomethane			toluene		2900
1,1,1-trichloroethane			trichlorofluoromethane			trichloroethylene		16
hexachloroethane			dichlorodifluoromethane			vinyl chloride		
1,1-dichloroethane		12	chlorodibromomethane			aldrin		<0.05
1,1,2-trichloroethane			hexachlorobutadiene			dieldrin		<0.05
1,1,2,2-tetrachloroethane			hexachlorocyclopentadiene			chlordane		<1.0
chloroethane			isophorone			4,4'-DDT		<0.05
bis (chloromethyl) ether			naphthalene		225	4,4'-DDE		<0.05
bis (2-chloroethyl) ether		5	nitrobenzene			4,4'-DDD		<0.05
2-chloroethyl vinyl ether			2-nitrophenol			α-endosulfan		<0.05
2-chloronaphthalene			4-nitrophenol			β-endosulfan		0.08
2,4,6-trichlorophenol			2,4-dinitrophenol			endosulfan sulfate		<0.05
parachlorometa cresol			4,6-dinitro-o-cresol			endrin		<0.03
chloroform		9	N-nitrosodimethylamine			endrin aldehyde		0.11
2-chlorophenol			N-nitrosodiphenylamine		3	heptachlor		0.91
1,2-dichlorobenzene		260	N-nitrosodi-n-propylamine		12	heptachlor epoxide		<0.05
1,3-dichlorobenzene		2	pentachlorophenol			α-BHC		<0.05
1,4-dichlorobenzene		25	phenol		32	β-BHC		0.24
3,3'-dichlorobenzidine			bis(2-ethylhexyl) phthalate		1613	γ-BHC (lindane)		<0.05
1,1-dichloroethylene			butyl benzyl phthalate		11	δ-BHC		<0.05
1,2-trans-dichloroethylene			di-n-butyl phthalate		11	PCB-1242 (Arochlor 1242)		
2,4-dichlorophenol			di-n-octyl phthalate		20	PCB-1254 (Arochlor 1254)		<3.0
1,2-dichloropropane			diethyl phthalate			PCB-1221 (Arochlor 1221)		
1,3-dichloropropylene			dimethyl phthalate			PCB-1232 (Arochlor 1232)		
2,4-dimethylphenol		4	benzo(a)anthracene		≤14	PCB-1248 (Arochlor 1248)		<3.0
2,4-dinitrotoluene			benzo(a)pyrene			PCB-1260 (Arochlor 1260)		
2,6-dinitrotoluene			3,4-benzofluoranthene			PCB-1016 (Arochlor 1016)		
1,2-diphenylhydrazine			benzo(k)fluoranthene			Toxaphene		3.0
ethylbenzene		330	chrysene		≤14	Xylene		

ACID	GC	Date Extracted	Date Injected	Conc. Factor	Standard	Result
GC/MS			01-23-80	1.4846	Consent Decree	26-79-102
B-N	GC			0.018617		
GC/MS			01-23-80	0.7447, 0.07447	Consent Decree	26-79-102, 115
V	GC			0.010389, 0.0010389		
GC/MS			01-14-80	0.0005195, 0.000208	Consent Decree	32-79-102, 26-79-102
PEST.	GC		01-30-80	24.75	Consent Decree	36-79-102

All parameters above were searched for - blank spaces indicate not detected.

\* = <10 µg/L \*\* = <5 µg/L m = GC/MS < = Sum of two compounds not separated by the method used. A = Average  
Sample matrix too complex after cleanup to achieve lower detection limit for pesticide

PROJ	TASK	MO	DAY	RICE	NBR	IDENT	TYPE	AMOUNT

Re: DHMM  
Hukill Chemical Corporation  
Cuyahoga County  
Permit No. 02-18-0315

Mr. Robert L. Hukill  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

August 17, 1982

Dear Mr. Hukill:

I conducted a hazardous waste inspection at your facility located at 7013 Krick Road on May 27, 1982. You, Emery Hukill, Kevin Lehner, David Marlin, and Bob Lang represented the facility during the inspection. The facility was inspected for compliance with both State and Federal regulation for the handling of hazardous wastes.

The following violations and/or concerns were noted during the inspection:

<u>Description of Violation</u>	<u>Regulation</u>
Lack of an artificial or natural barrier completely surrounding the active portion of the facility	40 CFR Part 265.14 OAC 3745-55-14
Lack of controlled entry.	40 CFR Part 265.14 (2)(11) OAC 3745-55-14 (B)(2)(b)

We also discussed the excess acid that is brought in for regeneration. This acid should be handled as a waste acid and be manifested when it meets the definition of D002 wastes.

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Kathy Homer of U.S. EPA Region V.

Your facility will be reinspected within 60 days to determine compliance with the above listed violations.

Please advise me or Kathy Homer at (312) 886-7435 if you have any questions.

Yours truly,

Enclosure

David N. Werz  
Environmental Scientist  
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM, C.O.  
Bob Fragale, HWFAB, C.O.  
Kathy Homer, U.S. EPA,  
Region V

DNW:c11



JUN 14 1982

Mr. Mark Wallach  
Calfee, Halter & Griswold  
1800 Central National Bank Building  
Cleveland, Ohio 44114

Re: Hukill Chemical Corporation

Dear Mr. Wallach:

This letter is written to confirm the agreements reached at our meeting of May 17, 1982, with representatives of the United States Environmental Protection Agency, Region V (U.S. EPA), the Ohio Environmental Protection Agency (OEPA) and Hukill Chemical Corporation.

The purpose of the meeting was to view the Hukill facility and to discuss problems and violations which remain at the facility. At the meeting, U.S. EPA presented a proposed list of actions which it wants the company to undertake pursuant to the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA) to address the remaining problems. A copy of Region V's proposal is appended to this letter, along with a list of the meeting's attendees.

At the meeting, Robert Hukill, Vice President of Hukill Chemical Corporation, agreed to hire a consultant to develop a study defining the extent of contamination at the facility, in accordance with item 1 of U.S. EPA's proposal.

It was agreed that the initial extent of contamination study would include the following areas: a. the area around the buried cistern, b. the area in and around the process/storage tanks located on the north side of the property, c. the old drainage ditch running north of the process/storage tank farm area, and d. other known areas of contamination. The areas identified in items c and d of Appendix A to Region V's proposal were deleted from the scope of the study. U.S. EPA will determine whether the scope of study should include the disturbed area located on the north side of the facility, after reviewing studies performed by OEPA in that area following removal of stained topsoil by the company in 1980. It was also agreed that the groundwater contamination study would be limited to the area of the buried cistern. Further groundwater studies may be required if this area shows a high degree of contamination and potential for migration to surface waters.

Hukill Chemical Corporation agreed to provide EPA with the technical basis for installing a reverse well-head pumping system at the buried cistern to collect leachate. The explanation should be sufficiently detailed to document the efficacy of the project.

Items 3, 4, and 5 of Region V's proposed requirements, which relate to CWA violations at the facility, are necessary to assess and verify the remedial actions that have been and will be undertaken by Hukill Chemical Corporation. Item 4 of the proposal was modified to require the company to submit a new NPDES permit renewal application only if the company fails to achieve its goal of zero discharge. The results of the monitoring program, discussed in item 4 will ultimately decide whether or not the company will be required to submit another application form. Hukill Chemical Corporation should be prepared to discuss the timetable for completion of items 3, 4, and 5 at our next discussion.

At the conclusion of the meeting, it was agreed that correspondence relating to the Part B Permit Application will be sent to Rick Karl, the designated permit writer at U.S. EPA, while all other correspondence relating to this matter shall be sent to U.S. EPA marked to my attention. Rick Karl reiterated during the meeting that the Part B Hazardous Waste Management Permit Application must be submitted to U.S. EPA by September 30, 1982.

Finally, it was agreed that a company representative would contact me during the week of May 31, 1982, for a status report. On June 8, 1982, you contacted me to report that Robert Hukill invited three consulting firms, with expertise in hydrology and geology, to submit bids to perform the work discussed above. Mr. Hukill is requiring the submittal of firm proposals by June 25, 1982, and he will make a decision by July 1, 1982. You stated that Mr. Hukill will be in a position to commit to a timetable for completion of the work discussed in items 1 and 2 of Region V's proposal, upon selection of the contractor.

A company representative should contact me during the week of July 5, 1982, to present a second status report and the company's proposed timetable for completion of the work identified in items 1 through 5 of Region V's proposal. Following that discussion, I will circulate a draft agreement for approval and signature.

If you have questions regarding this matter please call me.

Very truly yours,

Babette J. Neuberger  
Assistant Enforcement Counsel

Enclosures

cc: Robert L. Hukill  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Melinda Becker/Mark Baumgardner  
Ohio Environmental Protection Agency  
Northeast District Office

Mr. Dennis P. Zapka, Assistant U.S. Attorney  
Northern District of Ohio

bcc: Acierito/Karl ✓  
Schulteis/Grimes/Ullrich/Schaefer  
Tom Ross, EPA-HQ (EN-329)

May 17, 1982

List of Meeting Attendees

Dennis P. Zapka, Assistant United States Attorney

Babette J. Neuberger, Assistant Enforcement Counsel, U.S. EPA

Robert L. Hukill, Vice President, Hukill Chemical Corporation

Mark I. Wallach, Calfee, Halter & Griswold

Kevin P. Lehner, J.J. Keller & Associates, Inc.

David Marlin, Hukill Chemical Corporation

Paul Pustay, Consultex Corporation

Leon F. Acierto, U.S. EPA - Chicago

Dan Watson, U.S. EPA - West Lake

Rick Karl, U.S. EPA - Chicago

Emory Hukill, President, Hukill Chemical Corporation

Dave Wertz, Ohio EPA - Northeast District Office

Melinda Merryfield - Becker, Ohio EPA - Northeast District Office

Mark T. Baumgardner, Ohio EPA - Northeast District Office

United States Environmental Protection Agency, Region V

Technical Proposal for Hukill Chemical Corporation Facility in Bedford, Ohio

1. Develop an approvable plan and implementation schedule for determining the nature and extent of groundwater, surface water and soil contamination, if any, resulting from the facility's storage and disposal practices. The plan should include specific procedures for soil sampling and analysis, including the use of a detailed vertical and horizontal grid pattern to develop a three-dimensional spatial distribution of contamination at the facility. The plan should include areas identified in Appendix A. The following should also be determined groundwater flow direction and rate, groundwater quality upgradient and downgradient of the facility, surface water quality of any standing water at the facility. All samples should be analyzed for COD, TOC, pH, chlorides, priority heavy metals and organic pollutants.

2. Upon defining the area and extent of contamination, Hukill should develop an approvable plan and implementation schedule for removal of contaminated soil and prevention of further groundwater and surface water contamination, if it is deemed necessary. Remedial action should be conducted upon approval of the plan by EPA, and in accordance with the implementation schedule.

3. Develop a detailed description of corrective measures to be taken for achieving compliance with permit limitations for outfalls 001 and 002 (or 601) and the elimination/treatment of unauthorized discharges, including priority pollutants. A block diagram of any proposed treatment or control system should be included.

4. Develop an approvable monitoring plan and timetable for confirming effective treatment/elimination of unauthorized discharges, including priority pollutants. The plan should include sample type, frequency and analytical protocols. Upon completion of all remedial measures a revised NPDES Application Form 2c should be submitted to EPA.

5. Hukill should submit the following information to EPA:

- a. a current plot plan showing the location(s) of all discharge points to the receiving stream.
- b. a written explanation of the cause(s) of instances of non-compliance with permit limitations for BOD and TOC and the presence of substantial organic priority pollutants in the outfall 001 discharge.
- c. an accurate description of the significant manufacturing operations currently occurring in the plant; identify all major unit operations and associated plant equipment;
- d. a current simplified flow diagram of the total water system showing all significant wastewater sources (process, cooling, floor drains, sanitary, storm and miscellaneous), wastewater treatment methods, collection systems and flow path(s) from the source(s) to the receiving water. All significant parameters including hydraulic flows should be identified for each discharge point;
- e. with respect to the process wastewater discharge to the Walton Hills POTW provide an assessment of the facility's compliance with pretreatment requirements imposed by the sewer authority and/or the United States Environmental Protection Agency. If current practices are not in conformance with said regulations, provide detailed description of corrective measures and implementation dates to achieve compliance.

#### APPENDIX A

Proposed areas for inclusion in "extent of contamination" study:

- a. liquid wastes contained in any underground tanks at the facility; and the area around said tanks
- b. the area in and around the process/storage tanks located on the near north side of the facility;
- c. the area in and around the storage tanks and tank trucks on the west side of the facility;
- d. the drum storage area located on the north side of the facility;
- e. the disturbed area located on the north side of the facility;
- f. all erosion channels, drainage ditches and possible drainage paths leading to the stream as well as the bank of the stream channel, and
- g. other areas of ground stain and other known areas of contamination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: September 11, 1981

SUBJECT: Inspection of the Hukill Chemical Corporation, Bedford, Ohio

FROM: Daniel C. Watson, Physical Scientist  
THRU: A. R. Winkhofer, Director, EDO

TO: Bill Miner, SEWHME  
ATTN: Leon Acierto

Acting on Leon F. Acierto's request dated June 18, 1981, EDO personnel conducted an unannounced inspection and sampling survey at Hukill Chemical Corporation, Bedford, Ohio, on June 18-19, 1981. Photographs were taken during the survey and are included in the enclosed report.

The company's distillation systems, sumps, and tank farm seem to still be contaminating Outfalls 001 and 002, the 10 inch tile pipe and the "blue box" which discharges to the Bedford STP. The company's NPDES permit must be modified to include limits on the metals and organic compounds being discharged by the company to the creek.

Attachments

Bab —  
Yann copy

Leon  
9/17

Tank - Tank



## NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last page)

OMB No. 158-0097

TRANSACTION CODE		NPDES										YR		MO		DA		TYPE		INSPECTOR		FAC TYPE		TIME	
1		2		3		4		5		6		7		8		9		10		11		12		13	
N		5		0		H		0		0		6		3		4		4		4		8		1	
1		2		3		4		5		6		7		8		9		10		11		12		13	
REMARKS																									
21																									
65																									
70																									
SECTION A - Permit Summary																									
NAME AND ADDRESS OF FACILITY (Include County, State and ZIP code)																						EXPIRATION DATE			
Hukill Chemical Corporation																						expired 5/3/81			
7013 Krick Road																						ISSUANCE DATE			
Bedford, OH 44146																						5/4/77			
RESPONSIBLE OFFICIAL													TITLE							PHONE					
Robert Hukill													President							216-232-9400					
FACILITY REPRESENTATIVE													TITLE							PHONE					
Same																									
SECTION B - Effluent Characteristics (Additional sheets attached _____)																									
PARAMETER/OUTFALL		MINIMUM	Daily AVERAGE	Daily MAXIMUM	ADDITIONAL																				
001 BOD <sub>5</sub>	SAMPLE MEASUREMENT			>336 mg/l																					
	PERMIT REQUIREMENT		30 mg/l	45 mg/l																					
001 TOC	SAMPLE MEASUREMENT			53 mg/l																					
	PERMIT REQUIREMENT		60 mg/l	90 mg/l																					
001 pH	SAMPLE MEASUREMENT			7.8 su																					
	PERMIT REQUIREMENT	6 su		9 su																					
601 BOD <sub>5</sub>	SAMPLE MEASUREMENT			< 5 mg/l																					
	PERMIT REQUIREMENT			45 mg/l																					
601 TOC	SAMPLE MEASUREMENT			7 mg/l																					
	PERMIT REQUIREMENT			90 mg/l																					
SECTION C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)																									
U EFFLUENT WITHIN PERMIT REQUIREMENTS													OPERATION AND MAINTENANCE							SAMPLING PROCEDURES					
RECORDS AND REPORTS													COMPLIANCE SCHEDULE							LABORATORY PRACTICES					
PERMIT VERIFICATION													FLOW MEASUREMENTS							OTHER:					
SECTION D - Comments																									
SECTION E - Inspection/Review																									
SIGNATURES													AGENCY							DATE					
INSPECTED BY																									
INSPECTED BY																									
REVIEWED BY																									
ENFORCEMENT DIVISION USE ONLY																									
COMPLIANCE STATUS																									
<input type="checkbox"/> COMPLIANCE																									
<input type="checkbox"/> NONCOMPLIANCE																									

18

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable		PERMIT NO. OH 0063444
<b>SECTION F - Facility and Permit Background</b>		
ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code)	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE 9/30/80 U.S. EPA	
	FINDINGS  RCRA Survey	
<b>SECTION G - Records and Reports</b>		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS:		
(a) ADEQUATE RECORDS MAINTAINED OF:		
(i) SAMPLING DATE, TIME, EXACT LOCATION	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
<b>SECTION H - Permit Verification</b>		
INSPECTION OBSERVATIONS VERIFY THE PERMIT. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS:		
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED, estimates as required	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(i) ALL DISCHARGES ARE PERMITTED. back lot discharges	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>SECTION I - Operation and Maintenance</b>		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A (Further explanation attached _____)		
DETAILS: no treatment facility		
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. from distillation units	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(e) ALL TREATMENT UNITS IN SERVICE.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(l) SPCC PLAN AVAILABLE.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO <input type="checkbox"/> N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____)	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A

PERMIT NO.  
OH0063444

## SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☐ NO ☒ N/A (Further explanation attached \_\_\_\_\_)

## CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

## SECTION K - Self-Monitoring Program

## Part 1 - Flow measurement (Further explanation attached \_\_\_\_\_)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. ☒ YES ☐ NO ☐ N/A  
DETAILS:

- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. Estimate ☐ YES ☐ NO ☒ N/A  
TYPE OF DEVICE: ☐ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER (Specify \_\_\_\_\_)
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration \_\_\_\_\_) ☐ YES ☐ NO ☒ N/A
- (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED. ☐ YES ☐ NO ☒ N/A
- (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED. ☐ YES ☐ NO ☒ N/A
- (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES. ☐ YES ☐ NO ☒ N/A

## Part 2 - Sampling (Further explanation attached \_\_\_\_\_)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. ☐ YES ☒ NO ☐ N/A  
DETAILS: Outfalls 001 and 002 are not combined as described in their expired permit.

- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☒ YES ☐ NO ☐ N/A
- (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT. ☒ YES ☐ NO ☐ N/A
- (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. ☒ YES ☐ NO ☐ N/A  
IF NO, ☒ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE. ☒ YES ☐ NO ☐ N/A
- (i) SAMPLES REFRIGERATED DURING COMPOSITING ☐ YES ☐ NO ☒ N/A
- (ii) PROPER PRESERVATION TECHNIQUES USED ☒ YES ☐ NO ☐ N/A
- (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT ☐ YES ☐ NO ☒ N/A
- (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 ☐ YES ☐ NO ☒ N/A
- (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT. ☐ YES ☒ NO ☐ N/A
- (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT. ☐ YES ☐ NO ☒ N/A

## Part 3 - Laboratory (Further explanation attached \_\_\_\_\_)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. ☒ YES ☐ NO ☐ N/A  
DETAILS:

- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) ☒ YES ☐ NO ☐ N/A
- (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. ☐ YES ☐ NO ☒ N/A
- (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. ☐ YES ☒ NO ☐ N/A
- (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ YES ☐ NO ☐ N/A
- (e) QUALITY CONTROL PROCEDURES USED. ☒ YES ☐ NO ☐ N/A
- (f) DUPLICATE SAMPLES ARE ANALYZED. \_\_\_\_\_ % OF TIME. Not available ☐ YES ☐ NO ☐ N/A
- (g) SPIKED SAMPLES ARE USED. \_\_\_\_\_ % OF TIME. Not available ☐ YES ☐ NO ☐ N/A
- (h) COMMERCIAL LABORATORY USED. ☒ YES ☐ NO ☐ N/A
- (i) COMMERCIAL LABORATORY STATE CERTIFIED. ☐ YES ☐ NO ☒ N/A

LAB NAME Environmental Research Group (ERG)LAB ADDRESS Cleveland, Ohio

PERMIT NO.  
OH0063444

## SECTION L - Effluent/Receiving Water Observations (Further explanation attached \_\_\_\_\_)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	No	No	No	No	No	Yellow	Dark brown to black at stream.
601	No	No	No	No	No	Yellow	
WWTP Discharge	No	No	No	Yes	No	White	

(Sections M and N: Complete as appropriate for sampling inspections)

## SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached \_\_\_\_\_)

- ☒ GRAB SAMPLES OBTAINED  
☒ COMPOSITE OBTAINED  
☐ FLOW PROPORTIONED SAMPLE  
☒ AUTOMATIC SAMPLER USED  
☒ SAMPLE SPLIT WITH PERMITTEE  
☒ CHAIN OF CUSTODY EMPLOYED  
☐ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY hourly PRESERVATION \_\_\_\_\_SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE \_\_\_\_\_

## SECTION N - Analytical Results (Attach report if necessary)

Report Attached

Compliance Sampling Inspection  
Hukill Chemical Corporation  
Bedford, Ohio

June 18-19, 1981

Daniel C. Watson, Physical Scientist

Performed by  
U.S. Environmental Protection Agency  
Eastern District Office  
25089 Center Ridge Road  
Westlake, Ohio 44145



I. Site Locations and Identification

Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Ohio EPA Permit No.

F 336\*AD

NPDES Permit No.

OH 0063444

Effective Date of Permit

May 4, 1977

Expiration Date of Permit

May 3, 1981 (expired)

Receiving Water Body

Unnamed tributary of Tinkers Creek

Responsible Official

Robert Hukill, President

II. Dates of Inspections and Participants

June 18-19, 1981

Hukill Chemical Corporation

Robert Hukill, President  
Robert Lang, Operations Manager

Ohio EPA

Gary Gifford, Engineer, NEDO

U.S. EPA

Daniel C. Watson, Physical Scientist, EDO  
Philip Gehring, Biologist, EDO  
Joseph Good, General Mechanic  
Charles Beier, Engineering Technician

III. Objectives

This survey was completed pursuant to a May 1, 1981 request from the Region V Enforcement Division to assess compliance with the Clean Water Act (CWA) and to perform an SPCC plan check.

#### IV. Findings and Conclusions

1. The condition of the tank farm is the same as on previous surveys except for the drilling of some "well points" or sumps to catch spilled solvents and rain water. Sludge from the tanks and sumps is no longer sent to Robert Ross and Sons for disposal. Instead it is mixed with scrap solvents and sold to J&L Steel Corporation in Cleveland for use as a fuel. Sewers have been constructed outside the tank farm and will drain the backlot area including the swales to Outfall 001.
2. The "blue box" (junction box where cooling water from the distillation units enters a discharge pipe which goes to the sanitary sewers), Outfall 001, Outfall 002, and the 10" tile pipe were high in metals and organics indicating the following:
  - a. More than non contact cooling water is being discharged to the "blue box".
  - b. Distillation systems are contaminating Outfalls 001 and 002, which are in turn discharging metals and organics to a tributary of Tinker's Creek. The company's NPDES permit should be written to include these substances.
  - c. Metals and organics are entering the 10" tile pipe from the tank farm or from tank truck loading and unloading operations.
3. The scrap solvent storage area is no longer used and has been cleaned. The "capped pipe of unknown origin", mentioned in previous reports, has been capped with concrete. The french drain and catch basin, located in this area, was filled in with dirt during this survey.
4. Outfalls 001 and 002 have not been combined as indicated in the company's expired NPDES permit.
5. Treatment of all process, cooling, and runoff water prior to discharge to Tinkers Creek or the Bedford sewerage system for toxic organic pollutants should be required by an amended NPDES permit.

#### V. Description of Permittee

##### A. Facility, Wastewater Treatment and Containment Systems

The Hukill Chemical Corporation is located at 7013 Krick Road, Bedford, Ohio 44146. Hukill is a full line chemical distributor.

The facility is divided into five areas.

- (1) Acid packaging and blending.
- (2) Solvent recovery.
- (3) PVC pipe cement manufacturing.
- (4) Chemical warehouse areas.
- (5) Tank farm.

##### (1) Acid Packaging and Blending

The west area of the plant is used for acid products. Processes performed here are the blending, neutralization, packaging, and regeneration of acids (list in attached company pamphlet). Located outside this section of the plant is a bulk acid storage area consisting of one large bulk storage tank and three smaller portable tanks. These tanks

are in a concrete diked area with 1 foot thick by 4 foot high reinforced walls with a 30 inch footer. Drains in this area go to a 1000 gallon fiberglass sump. The acid from the sump is pumped to the storage tanks, neutralized and drained to the Bedford sanitary sewer system.

## (2) Solvent Recovery and Blending

Hukill takes in about 125,000 gallons of liquids a month for reclaiming and reclaims 60-65% of this for resale. Most are reportedly wastes from solvent cleaning operations such as mill wash from paint manufacturers. Reclaiming is accomplished by fractional distillation using a distillation evaporator. The distillation evaporator consists of a huwa thin film evaporator with steam jackets using a shell and tube type water cooled condenser and steam jet water eductor vacuum system. Located next to the distillation equipment is a small blue box with a drain. Three pipes drain into this box, one from the condenser, one from the vacuum system and one from the reactors. This box drains to the sanitary sewers.

All drains in the solvent recovery area go to a sump of approximately 1000-1500 gallons capacity. The sump's contents are periodically blended with waste solvents and sold to J&L Steel Corporation for use as a boiler fuel.

## (3) PVC Pipe Cement Manufacturing

Hukill no longer produces PVC pipe cement. The area where the cement was produced, along with the solvent recovery area and the laboratory, drains to the 1000-1500 gallons capacity sump mentioned in V.A.(2).

## (4) Chemical Warehouse Areas

The inside chemical storage area drains into the 1000-1500 gallon sump noted in sections V.A.(2) and V.A.(3).

The loading dock drain discharges storm water through Outfall 002. A spill prevention tank is located between the outfall and the drain for containing any solvent or acid spills at the loading dock. A curb has been installed around this area and a blind sump has been added inside the curbing. The company has plans to put a roof over this area.

There are three outdoor chemical storage areas. The first outside chemical storage area is located next to the distillation area and has an asphalt base. A drain in this area reportedly empties into a sump. Spills in this area go either to this area's drain or to a tributary to Tinker's Creek via runoff.

The second outdoor chemical storage area is located next to Hukill's tank farm. This area has a porous dirt base. Spills in this area contaminate runoff which flows to a tributary to Tinker's Creek.

The third storage area was for scrap solvents and is located on a barren, steeply sloped bank of a tributary to Tinker's Creek. This area is no longer used for storage.

## (5) Tank Farm

Hukill has a tank farm, located behind the enclosed chemical storage area, consisting of 28 bulk storage tanks with a total volume of approximately 280,000 gallons. One of the bulk storage tanks contains sludge from the sumps and the rest of the tanks contain reclaimed solvents. The tank farm has a gravel base surrounded by an earthen dike. According to Hukill officials there are no drains in the tank farm. Two "well points" or small sumps have been drilled in the tank farm. Tank farm runoff no longer is allowed to evaporate. ~~It is now pumped to a storage tank.~~ ? or thru outfall 001?

## B. Self Monitoring

The company monitors Outfalls 001 and 002 for the constituents and at the frequency required in NPDES permit OH 0063444.

Hukill's permit requires flow to be estimated twice a month for Outfall 001 and 002. BOD<sub>5</sub> and TOC must be measured twice a month from composite samples. A monthly grab sample is used for pH analysis.

Self monitoring records are retained for the required three year period. All analysis records were properly recorded and retained. Samples are analyzed by Mogul Corporation of Chagrin Falls, Ohio, under contract to Hukill.

The monitoring program is inadequate for characterizing the discharge from this facility as flows are only estimated, there is no monitoring for toxic compounds, and the frequency of monitoring is not high enough to detect spills.

The company's expired NPDES permit shows Outfalls 001 and 002 combined into Outfall 001. The permit requires sample collection at Outfall 001 and at a manhole designated as Outfall 601 located prior to old Outfall 002 connecting to Outfall 001. These outfalls have not been combined and samples are actually collected at Outfalls 001 and 002.

## VI. U.S. EPA Sampling Program

### A. Sampling Methods and Locations

Samples were collected by EDO personnel on June 18-19, 1981. Flows at Outfalls 001 and 002 were extremely low (approximately 4 gallons per hour at Outfall 001 and approximately 11 gallons per hour at Outfall 002). ~~Samples were collected at each outfall by channeling the flow with aluminum foil to provide a stream suitable for filling the sample bottles.~~ An ISCO automatic sampler operating from 1025 June 18 to 0925 June 19 was used to collect a 24-hour composite sample of the discharge through the "blue box" to the sanitary sewer. ~~The flow through this discharge is approximately 18,000 gallons per day.~~ Following is a list of samples collected by EDO personnel during the June 18-19, 1981 survey:

<u>Sample Number</u>	<u>Type</u>	<u>Location</u>
81EW07		
S01	grab sample - water	Outfall 002
S05	grab sample - water	Outfall 001
S07	sediment	Dumped material on northeast corner of the company's property
S09	24 hour composite	"Blue box" discharge to the WWTP
S10	VOA - grab	"Blue box" 6/18/81 1030
S11	VOA - grab	"Blue box" 6/19/81 0835
S12	VOA - grab	"Blue box" 6/19/81 1002
S13	grab sample - water	Tributary to Tinker's Creek upstream
S14	grab sample - water	Tributary to Tinker's Creek downstream
D15	grab sample - water	Duplicate of 81EW07S14
S16	sediment	Ditch in back lot
S17	grab sample - water	Ditch in back lot
S19	grab sample - water	Tributary to Tinker's Creek below S.K. Wellman Lake

## B. Permittee Participation

The personnel at Hukill Chemical Corporation were cooperative during the sampling program. Hukill personnel observed the sampling and samples were split with the company.

## C. General Conditions

Weather during the survey was clear and dry with high temperatures. Hukill Chemical Corporation was reportedly under normal operations during this survey.

## VII. Discussion

Note in Table I that the BOD<sub>5</sub> NPDES permit limit of 30 mg/l (30 day average) was exceeded for Outfall 001 during this survey (sample 81EW07S05 > 336 mg/l). Compliance with the 30 mg/l limit could not be achieved on a 30 day average basis if monitoring is only done twice per month. It should be noted that this effluent had a high solvent concentration, thus the actual BOD<sub>5</sub> is probably much higher than recorded. In Hukill's self-monitoring data for the period from April 1, 1981, to June 10, 1981, the outfall effluent exceeded permit limits 5 times for BOD<sub>5</sub> and 3 times for TOC. This again confirms that process waste from the solvent distillation area drains to Outfall 001. A possible source of these wastes is the "blue box" which reportedly drains to the sanitary sewers. The systems draining into the "blue box" are supposedly non-contact sources. The strong solvent odor at the "blue box" and out of the outfall disprove this. Hukill claims that Outfall 001's discharge consists of ground water. This outfall has a steady flow of about 96 gallons per day. A reasonable estimate of groundwater flow does not account for the total flow at Outfall 001. The presence of solvents in 001's discharge, (Table II) plus its steady flow indicates the possibility of additional sources inside the plant. A COD of 963 mg/l and the metals listed in Table II were found in sample 81EW07S05.

The "blue box" reportedly consists of non contact cooling water and is discharged to the city sanitary sewer system. A BOD<sub>5</sub> of 135 mg/l and COD of 565 mg/l were found in sample 91EW07S09. The sample had high concentrations of solvents indicating that the actual BOD<sub>5</sub> was probably much higher. Table III lists the metals and organic compounds found in sample 81EW07S09. The presence of these compounds confirm both of the following:

1. The sources to the "blue box" are not non-contact cooling water and have been contaminated with solvents.
2. There is an unknown source (possibly the blue box) draining to Outfall 001.

Outfall 002 had a BOD<sub>5</sub> of < 5 mg/l and a TOC of 7 mg/l which were both less than NPDES permit limits. pH was also within permit limits. The metals and organics found in sample 81EW07S01 are presented in Table IV.

Outfall 002 is reportedly for the drain at the loading dock with a spill prevention tank connected in the line between the outfall and the loading dock drain. There was a flow at this outfall of approximately 11 gallons per day during this survey.

Sample 81EW07S13 was a grab water sample collected from the creek upstream from Hukill's outfalls. Sample 81EW07S14 was a grab water sample collected from the creek downstream from Hukill's outfalls. A table comparison of the analytical results for these samples is presented in Table V.

Sample 81EW07S17 is a water sample and 81EW07S16 a sediment sample collected from a 10 inch tile pipe which surfaces in Hukill's back lot behind the company's tank farm. The metals and organic compounds present in these samples are shown in Table VI.

~~The ditch has now been filled with dirt approximately 200 feet from the plant roadway blocking any flow towards the tributary.~~

At the northeast corner of Hukill's property a material, light brown in color with a very fine texture, is being dumped. There was visual evidence that this material is leaching into the tributary. Sample 81EW07S07 was a sample of this material collected in the dump area and contained the metals and organic compounds listed in Table VII.

The "scrap" solvent storage area located on the west bank of a tributary to Tinker's Creek is no longer used. The area has been cleaned with no visible signs of spillage remaining. The capped pipe in this area has been blocked with concrete. Hukill personnel state that this pipe was used to decant the sump. In this area the company was to install a french drain and a catch basin to catch spills from the loading area and the tank farm. These were filled in with dirt at the time of the survey. Hukill still loads and unloads tank trucks with valves located outside the tank farm. Any spillage from these operations will go to the creek via runoff. These loading areas should be diked.

The stress areas shown on photographs taken on an overflight of the facility were walked and found to be non existent. Foliage was thick and green in all the areas. The "ground hog hole" mentioned before still exists and is still used for bleeding tank truck hoses.

Never  
completed  
Arch. 11

Table I

Samples Analyzed by EDO's Laboratory

Sample 81EW07	pH <u>Standard Units</u>	BOD <sub>5</sub> <u>mg/l</u>	Total Suspended Solids <u>mg/l</u>
S01 (Outfall 002)	7.5	< 5	14
S05 (Outfall 001)	7.8	> 336	21
S09 (Blue box to WWTP)	7.0	135	6
S13 (Upstream)	8.3	5	5
S14 (Downstream)	8.1	5	10
D15 (Duplicate of S14)	8.2	5	6
S17 (Back lot ditch)	7.3	58	284
S19 (Below S.K. Wellman Lake)	8.8	8	9



Table II

## Metal and Organic Compounds in Sample 81EW07S05 (Outfall 001)

<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>	<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>
Total Arsenic	6.4	Barium	153
Chromium	24.8	Lithium	45.7
Calcium	389 mg/l	Iron	7.56 mg/l
Magnesium	64.4 mg/l	Manganese	4170
Sodium	125 mg/l	Boron	326
Potassium	16.7 mg/l	Strontium	1650
Cobalt	11.5		

<u>Organic Compound</u>	<u>Concen- tration</u> <u>µg/l</u>	<u>Organic Compound</u>	<u>Concen- tration</u> <u>µg/l</u>
1,3-dichlorobenzene	11.1	Naphthalene	3.4
1,4-dichlorobenzene	9.7	<i>not soluble</i> Cyclo hexanol	6000
1,2-dichlorobenzene	9.4	1-Propoxybutzne	8900
Naphthalene	3.4	2-(1-methyl ethyl)	
		-1,3-dioxolane	2500
Isophorone	404.0	phenol	92.9
<i>not soluble</i> 1-propoxy-2-propanol	3800	1,1-dichloro ethane (PP)	6.8
1,2-dichloro ethene (PP)	352.4	trichloro ethene (PP)	151
tetrachloro ethylene (PP)	139.4	2,2-oxybis propane (PP)	6

(PP) denotes priority pollutant

✓ this lab may be able to analyze for these w/ their GC equipment

Table III

Metals and Organic Compounds Found in Sample 81EW07S09 (Blue Box)

<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>	<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>
Calcium	41.5 mg/l	Magnesium	10.6 mg/l
Iron	.192 mg/l	Sodium	14.0 mg/l
Potassium	5.6 mg/l	Barium	18.9 mg/l
Chromium	14.5	Copper	14.5
Manganese	14	Strontium	191

<u>Organic Compound</u>	<u>Concentration</u> <u>µg/l</u>	<u>Organic Compound</u>	<u>Concentration</u> <u>µg/l</u>
Isosporane	23.6	Trichloro ethene (PP)	25,868
Naphthalene	9.9	Tetrachloro ethylene (PP)	15,228
1,2-Dichloro ethene (PP)	2.7	1,1,1-Trichloro ethane	35,796
Methyl benzene	> 27,000	Chlorobenzene	430.3
Ethyl benzene	> 19,000	1,3-Dimethyl benzene	>80,000
1,2 and 1,4-Dimethyl benzene	> 28,322	Tribromo methane	975.9
Bromodichloro methane	23.1	4-Methyl-2-pentanone	166
Trichloro methane	1590.3	4-Methyl-1-2-pentanone	6.3

Table IV

Metals and Organic Compounds Found in Sampil 81EW07S01 (Outfall 002)

<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>	<u>Metal</u>	<u>Concentration</u> <u>µg/l</u>
Total Arsenic	7.2	Barium	68.2
Calcium	227 mg/l	Boron	429
Magnesium	33.9 mg/l	Chromium	9.2
Sodium	55.6 mg/l	Iron	5.210 mg/l
Potassium	16.9 mg/l	Manganese	1430
Cobalt	8.08	Lithium	61.4
Strontium	856		

<u>Organic Compound</u>	<u>Concentration</u> <u>(ppb)</u>	<u>Organic Compound</u>	<u>Concentration</u> <u>(ppb)</u>
Silyl compounds	4	1,3-dichloro benzene	.3
1,4-dichloro benzene	.3	Hexachloro ethane	.6
1,2,4-trichloro benzene	.1	Acenaphthene	.8
Fluorene	.7	1,2-diphenyl hydrazine	.2
Hexachloro benzene	1.3	Fluorathene	.6
1,1-dichloro ethane (PP)	6.2	1,2-dichloro ethene (PP)	31.5
Tetrachloro methane (PP)	39	Trichloro ethene (PP)	120.7
1,1,2,2-tetra chloroethane (PP)	24.4	Tetrachloro ethylene (PP)	60.9
2,2-oxybis propane (PP)	10.2	1,1,1-trichloro ethane	258.3

Table V

Comparison of Analytical Results for Samples 81EW07S13 (Upstream)  
and 81EW07S14 (Downstream)

<u>Parameter</u>	<u>Upstream (µg/l)</u>	<u>Downstream (µg/l)</u>
COD	30 mg/l	35 mg/l
TOC	6 mg/l	8 mg/l
<u>Metals</u>		
Calcium	74.3 mg/l	87.5 mg/l
Iron	.715 mg/l	1.19 mg/l
Zinc	.132 mg/l	.287 mg/l
Potassium	10.4 mg/l	12.5 mg/l
Magnesium	23.7 mg/l	24.3 mg/l
Sodium	60.0 mg/l	62.4 mg/l
Boron	721	688
Barium	32.6	40.5
Chromium	11.1	15.9
Copper	16.0	30.4
Lithium	14.8	16.5
Manganese	259	323
Strontium	312	359
<u>Organic Compounds</u>		
1,1-dichloro ethene (PP)	N.D.	1.9
1,2-dichloro ethene (PP)	N.D.	100.5
Trichloro ethene (PP)	N.D.	48.4
Tetrachloro ethylene (PP)	N.D.	158.1
1,1,1-trichloro ethane	N.D.	143.8
Methyl benzene	N.D.	10.2
1,2 and 1,4-dimethyl benzenes	N.D.	109.9

N.D. - None detected

Table VI

Metal and Organic Compounds found at the Back Lot 10 Inch Tile Pipe  
(81EW07S17 Water and 81EW07S16 Sediment)

<u>Metal</u>	<u>Sediment</u> ( $\mu\text{g/l}$ )	<u>Water</u> ( $\mu\text{g/l}$ )
Total Arsenic	84	17
Calcium *	5.9 mg/l	220 mg/l
Iron *	26 mg/l	15.1 mg/l
Zinc	.28 mg/l	.112 mg/l
Potassium *	1.5 mg/l	5.58 mg/l
Magnesium *	3.1 mg/l	16.4 mg/l
Sodium *	N.D.	5.66 mg/l
Boron	N.D.	158
Barium	80	191
Beryllium	.22	N.D.
Cadmium	1.5	N.D.
Cobalt	8.7	12.0
Chromium	N.D.	45.0
Copper	510	310
Lithium	18	31
Manganese	310	4030
Nickel	21	N.D.
Lead	280	N.D.
Tin	23	N.D.
Strontium	40	2610
Titanium	53	66.4
Vanadium	24	N.D.
Yttrium	8.0	N.D.

Table VI (continued)

<u>Organic Compound</u>	<u>Sediment</u> <u>(<math>\mu\text{g/l}</math>)</u>	<u>Water</u> <u>(<math>\mu\text{g/l}</math>)</u>
Hexachloro butadiene	46.0	N.D.
P-chloro-m-cresol	.3	N.D.
1,1-dichloro ethene (PP)	N.D.	4.6
1,2-dichloro ethene (PP)	N.D.	568.6
Tetrachloro methane (PP)	N.D.	10.3
Trichloro ethene (PP)	5.3	16.5
1,1,2,2-tetra chloroethane (PP)	5.7	N.D.
Tetrachloro ethylene (PP)	74.8	2.6
1,1,1-Trichloro ethane	3.4	37.8
1,1,2-Trichloro ethane	N.D.	1.8
Methyl benzene	34.1	2.4
1,3-Dimethyl benzene	8.8	7.1
1,2 and 1,4-Dimethyl benzene	494.8	423.9
Tribromo methane	N.D.	1.1

Table VII

## Analytical Results for Sample 81EW07S07 (Dump Site Material)

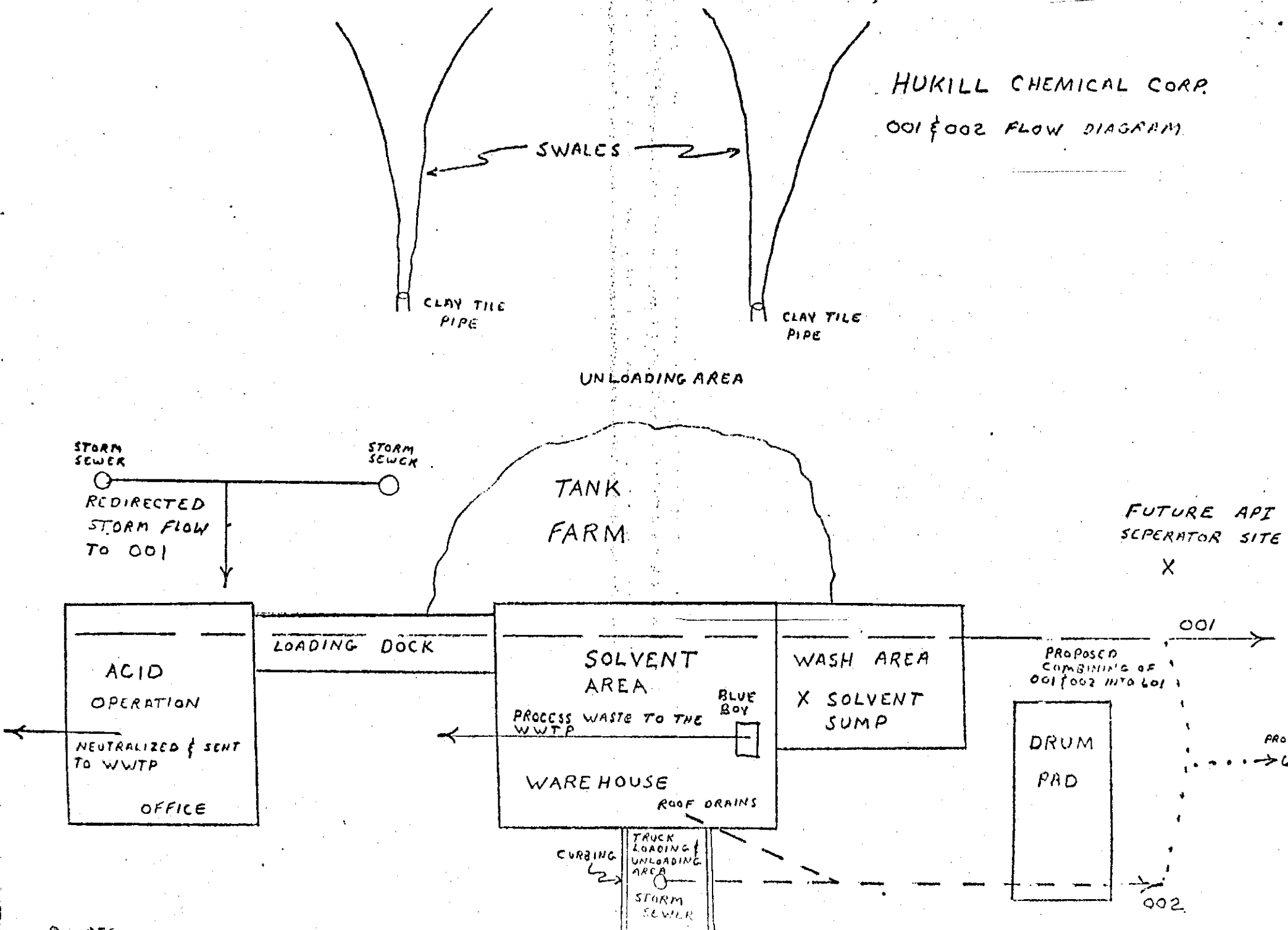
<u>Metal</u>	<u>Concentration</u> <u>(<math>\mu\text{g/l}</math>)</u>	<u>Metal</u>	<u>Concentration</u> <u>(<math>\mu\text{g/l}</math>)</u>
Total Arsenic	8.7	Copper	34
Calcium	150 mg/l	Lithium	19
Iron	19 mg/l	Manganese	470
Zinc	0.10 mg/l	Nickel	33
Potassium	1.7 mg/l	Strontium	190
Magnesium	7.5 mg/l	Tin	71
Barium	140	Titanium	510
Cobalt	7.6	Vanadium	25
		Yttrium	12

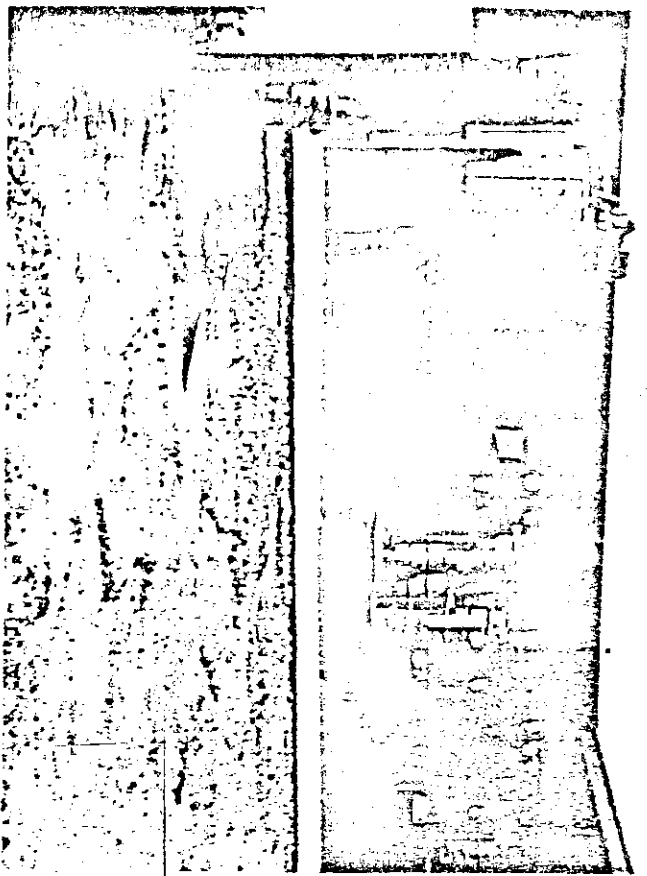
<u>Organic Compound</u>	<u>Concentration</u> <u>(<math>\mu\text{g/l}</math>)</u>	<u>Organic Compound</u>	<u>Concentration</u> <u>(<math>\mu\text{g/l}</math>)</u>
Hexachloro benzene	2.9	Anthracene	0.8
Phenanthrene	0.7	Di-n-butyl phthalate	4.6
Trichloro ethene (PP)	1.2	Tetrachloro ethylene (PP)	5.6
1,1,2-Trichloro ethane	6.6	Tribromo methane	10.4



HUKILL CHEMICAL CORP.

001 & 002 FLOW DIAGRAM





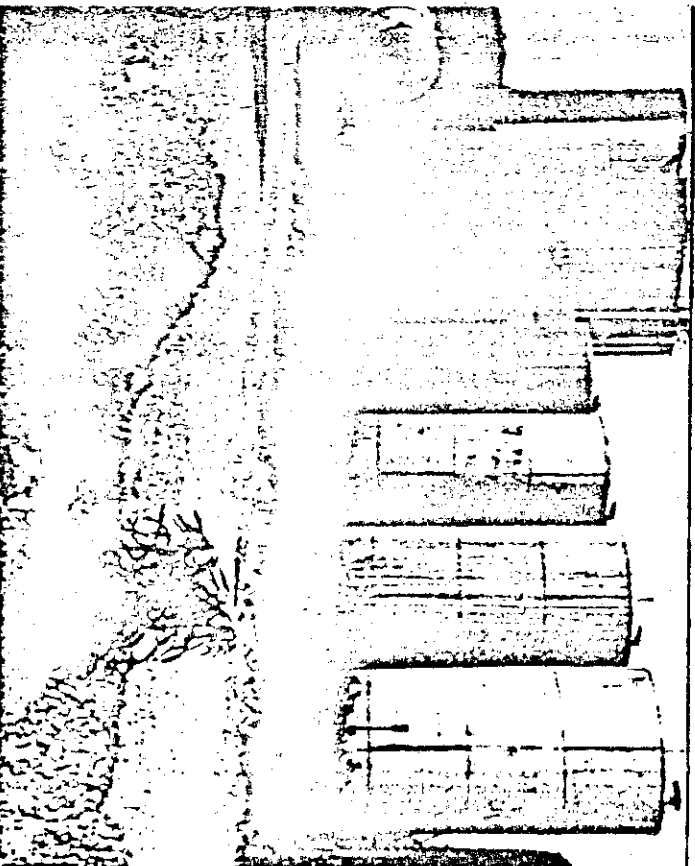
1. DRUM STORAGE AREA



2. DRUM STORAGE AREA



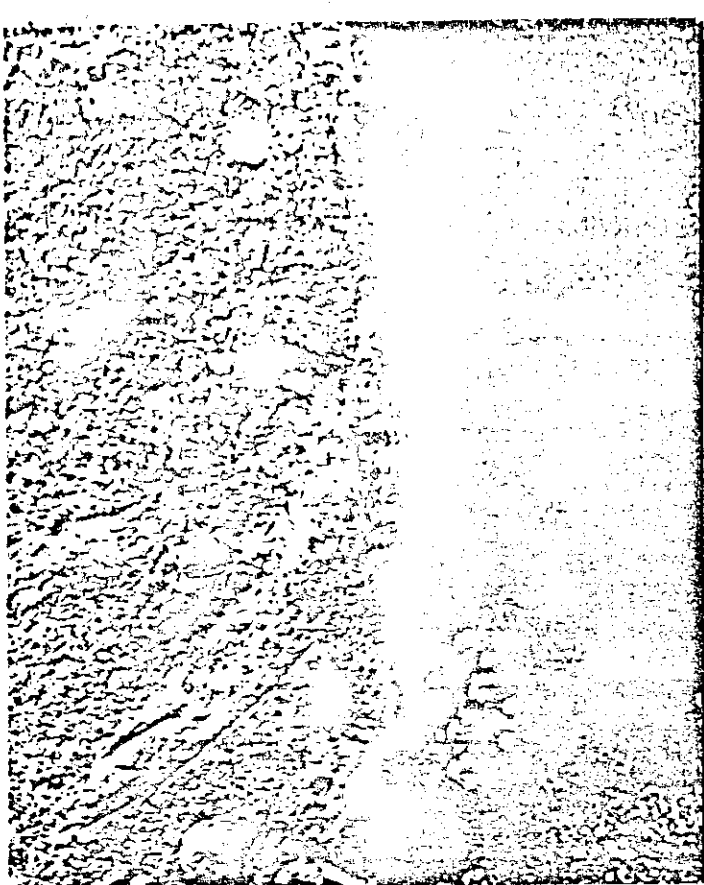
3. TANK F RM



4. TANK FARM



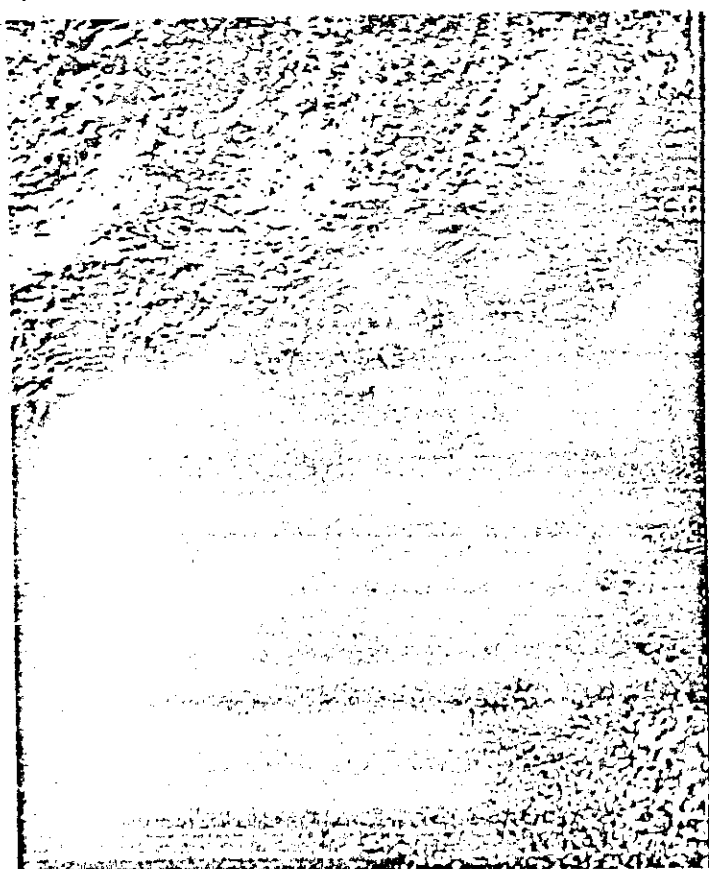
5. DUMP SITE IN BACK LOT



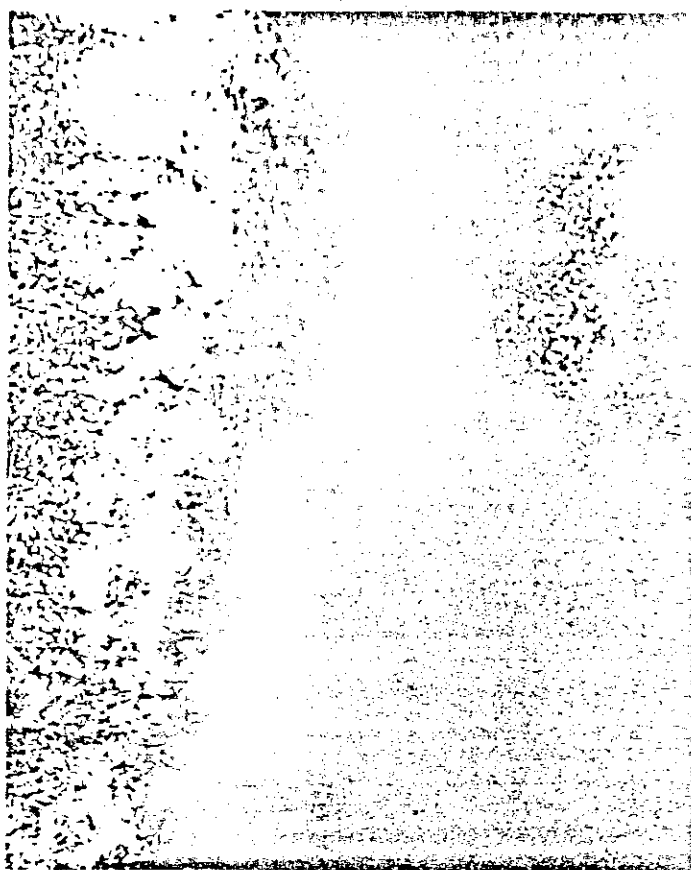
7. DUMPED MATERIAL ON EDGE OF CREEK



6. STREAM BEHIND HORTON CHEMICAL



8. DUMPED MATERIAL ON EDGE OF THE  
STREAM



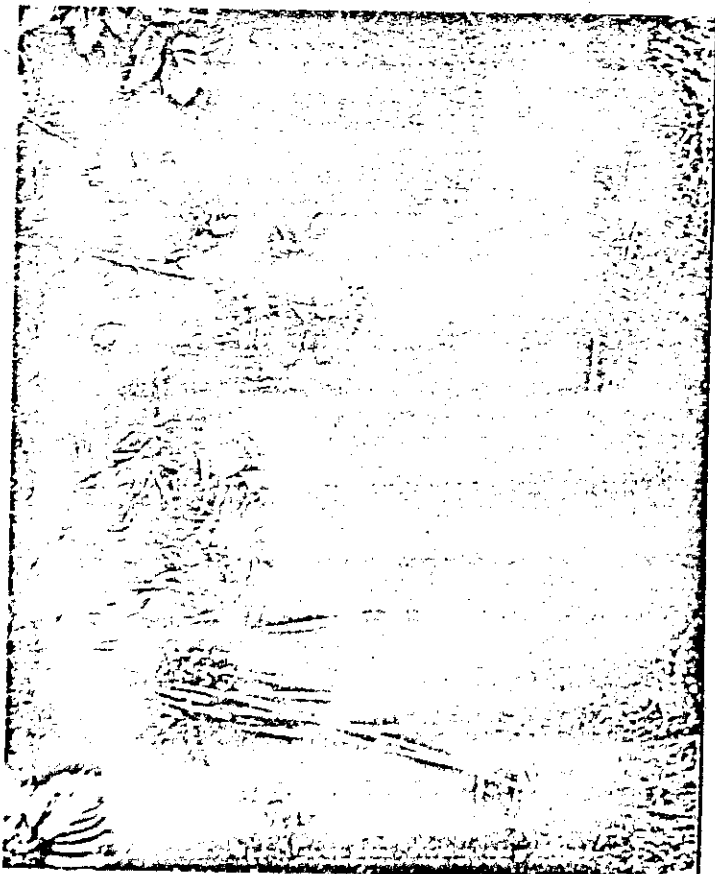
9. RUBBLE ON EDGE OF THE STREAM



11. DOWNSTREAM OF HUKILL CHEMICAL



10. FILLED IN FRENCH DRAIN AND CATCH BASIN  
NEAR OLD SCRAP SOLVENT STORAGE AREA

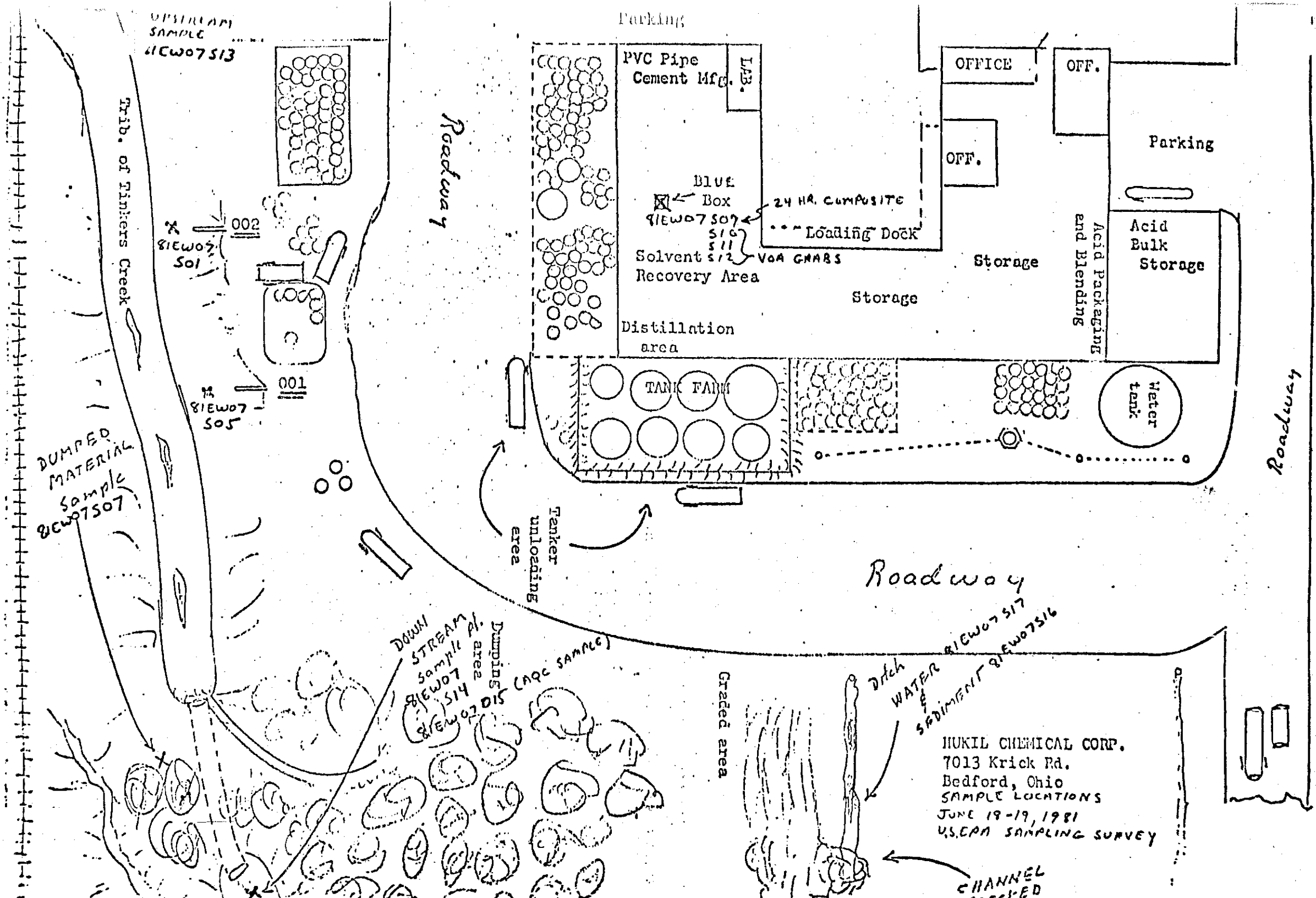


12. UPSTREAM OF HUKILL CHEMICAL

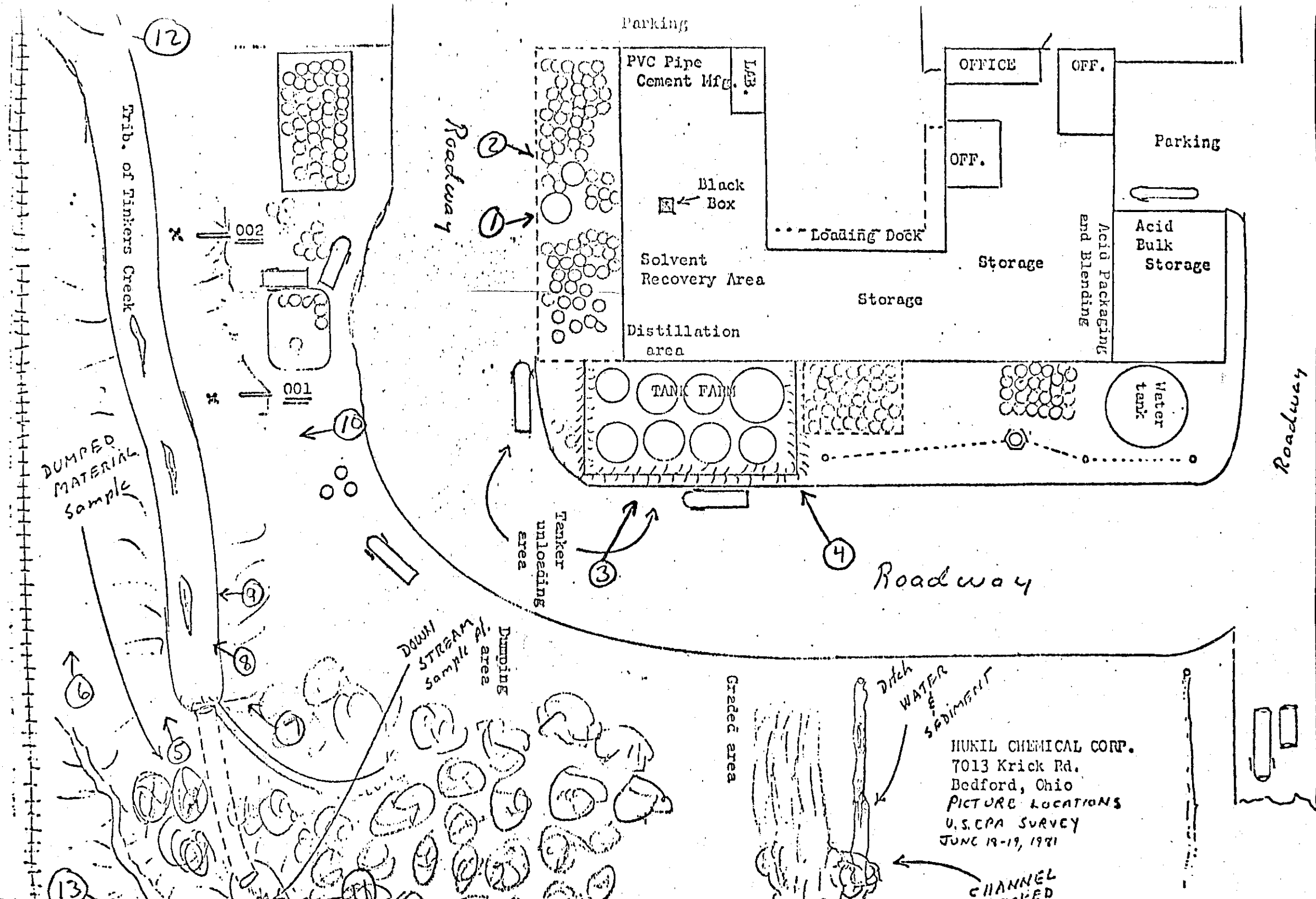


13. A POND IN BACK OF HURILL CHEMICAL'S  
PROPERTY AND ON THE OTHER SIDE OF THE  
RAILROAD TRACKS.









HUKIL CHEMICAL CORP.  
7013 Krick Rd.  
Bedford, Ohio  
PICTURE LOCATIONS  
U.S. EPA SURVEY  
JUNE 18-19, 1981

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

Art  
5/12/81

DATE: MAY 1 1981

SUBJECT: Request For: Inspection - Hukill Chemical Company,  
Bedford, OhioFROM: William H. Miner, Chief  
Engineering Section*Bill Miner*TO: Rich Winklhofer, Chief  
Eastern District Office

## PROJECT OBJECTIVE:

Sampling survey for characterizing wastewater discharges from NPDES discharge outfalls. The company partially diverted its process wastewater to a POTW in July 1980, and is in the process or has just completed combining outfall 002 with 001. An internal monitoring outfall (601) also has just recently been designated. This survey should document current and existing conditions and determine compliance or noncompliance with the CWA & NPDES permit. Twenty-four (24) hour composite sampling is desirable for this project. Proper methods for sampling, preservation and chain of custody should be strictly observed throughout.

Decision Unit B-303 Specific Activity Enforcement Priority 2  
Desired Completion Date ASAP Authority Law/Section CWA  
Principal Contact: Leon Acierito Phone 886-6766

Date:

Subject: Acknowledgment of Receipt of Work Request

From:

To:

           will do the above work (as specified) (with modifications).Target Comp. Date:            S&A Project No.            Est. Cost           S&A Project Leader:            Phone           

Comments:

**I. TYPE & ESTIMATED NUMBER OF SAMPLES - (AS Necessary)**

A. GROUND WATER _____	E. AIR _____	I. SLUDGE _____
B. SURFACE WATER _____	F. SOIL _____	J. OIL _____
C. RUNOFF/LEACHATE _____	G. SEDIMENT _____	K. OTHER _____
D. WASTE STREAM _____	H. BARREL _____	

**II. ANALYTICAL ANALYSIS REQUIRED**

A. METALS - ICAP   X  

BY FLAMELESS AA:

a. LEAD \_\_\_\_\_

d. MERCURY \_\_\_\_\_

b. ARSENIC \_\_\_\_\_

e. CADMIUM \_\_\_\_\_

c. SELENIUM \_\_\_\_\_

f. HEXAVALENT \_\_\_\_\_

g. OTHERS \_\_\_\_\_

B. CYANIDES \_\_\_\_\_

C. ORGANICS

a. BASE NEUTRAL FRACTION (PRIMARY, SUBSTITUTED BENZENES OTHER  
THAN PHENOLS)   X  

b. PESTICIDE FRACTION AND TRACE CHLORINATED ORGANICS   X  

c. PURGEABLE ORGANICS (HIGHLY VOLATILE SOLVENTS)   X  

d. ACID FRACTION (PHENOLICS)   X  

e. ORGANIC SCAN - SEDIMENTS (HEXANE/ACETONE EXTRACT) \_\_\_\_\_

f. PCBs   X  

D. ALL NPDES PERMIT PARAMETERS   X  

E. OTHER \_\_\_\_\_

cc: \_\_\_\_\_, EEIB

\_\_\_\_\_, DISTRICT OFFICE

CURTIS ROSS, CRL

bcc: Miner  
DiDomenico/Aciento

Leder  
Saidin Ellis

4/30  
4/30/81

Phil

REGION V

JUN 13 1981

Addendum to May 7, 1981, Request for Inspection - Hukill Chemical Company, Bedford, Ohio

Sandra S. Gardebring <sup>Original Signed by Sandra S. Gardebring</sup>  
Director, Enforcement Division

William H. Sanders, III  
Director, Surveillance & Analysis  
Division

I am requesting that the sampling inspection and the necessary laboratory analyses previously requested for the subject facility be changed to Priority 1. As was previously discussed between members of your staff and the Enforcement Division case assignees, the results of the survey and laboratory analyses should be available by August 1, 1981. The following specific items should be covered during the survey:

- 1) Twenty-four (24) hour composite sampling of outfalls CO1, CO2 and the waste stream leading to the POTW.
- 2) Grab sampling of all unauthorized discharges. Determine source(s) of past/present unpermitted discharges and where these discharges are currently discharging.
- 3) Determine what was involved in the tie-in in terms of what specific waste stream(s) were diverted to the POTW and the resulting wastewater piping diagram as compared to the set-up prior to the tie-in.
- 4) Sample any incoming chemical shipments coming from suspected or known sources of PCB's.
- 5) A walk-through inspection of what appears in the aerial photographs as dead vegetation pathway leading from two tanks/bulk storage tanks in the northwest side of the site, to the receiving stream. Trace pathways of all discharges to the receiving stream.
- 6) Determine all possible sources of contamination of outfall CO1 now reflected in their application for NPDES permit renewal.
- 7) Status of leachate collection system.
- 8) Determine what further remedial action may be necessary at the site to protect surface water, groundwater and the POTW.

Results should be forwarded to the Enforcement Division as soon as available.

cc: A.R. Winkhofer, Chief  
Eastern District Office

V. Boc: Acierio -  
Haberger

Curtis Ross, Chief  
Central Regional Laboratory

OHIO ENVIRONMENTAL PROTECTION AGENCY  
MODIFICATION OF NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES) PERMIT

ISSUE DATE: March 25, 1981

EXISTING PERMIT NO: F336\*AD

EFFECTIVE DATE: April 29, 1981

APPLICATION NO: F336\*BK

ENTITY NAME: Hukill Chemical Corporation

FACILITY LOCATION: 7013 Krick Road  
Bedford, Ohio 44146

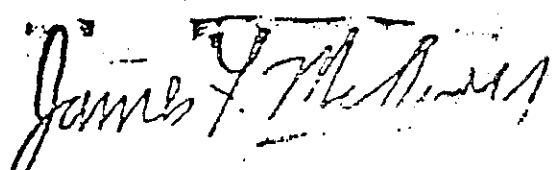
In accordance with Rule 3745-33-06 of the Ohio Administrative Code (formerly Ohio EPA Regulation EP-31-06), the above referenced NPDES permit is hereby modified as follows:

- Pg. 3 - Change designation in Item 4 from 002 to 601
- Pg. 4 - Change outfall designation from 002 to 601
  - Increase sampling frequency
  - Change Item 4, sampling instructions

Attached are the modified pages to the NPDES permit. (M3), (M4)

All terms and conditions of the existing permit not recommended for modification by this document will remain in effect. Further, any existing term or condition which this modification will change will remain in effect until any legal restraint to the imposition of this modification has been resolved. Any term or condition which this modification will change shall supersede, on the date this modification is effective, the existing respective term or condition of the permit.

When this modification is effective, the OEPA permit number will be changed to F336\*BD. The application number will remain OH0063444.

  
James F. McAvoy  
Director

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning effective date and lasting until May 3, 1981 the permittee is authorized to discharge from outfall serial number F336001.

Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type
	Daily Avg	Daily Max	Daily Avg	Daily Max		
Flow-M <sup>3</sup> /day (MGD)	-	-	-	-	Twice Monthly	Estimate
BOD <sub>5</sub>	-	-	30 mg/l	45 mg/l	Twice Monthly	Composite
TOC	-	-	60 mg/l	90 mg/l	Twice Monthly	Composite

2. The pH shall not be less than 6.0 nor greater than 9.0 and shall be monitored by a grab sample collected monthly.
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.
4. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations : at pipe outlet prior to mixing with stream.  
001- Sample shall be collected on same day that 601 sample is taken.
5. Refer to Part III for additional reporting requirements.



RE: Application Number 81-HW-0315  
Cuyahoga County

August 26, 1981

Robert L. Hukill, General Manager  
Hukill Chemical Corporation  
7013 Krick Road  
Bedford, Ohio 44146

Dear Mr. Hukill:

On April 29, 1981, Melinda Merryfield-Becker of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Robert Hukill.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan".

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V  
Melinda Merryfield-Becker, NEDO

CERTIFIED MAIL



DEFICIENCY NOTIFICATION TABLE  
ISS INSPECTION

FACILITY NO. - *Hukill Chemical Corporation 81-HW-0315*  
 OWNER - *Hukill Chemical Corp.*  
 FACILITY NAME - *Hukill*  
 FACILITY LOCATION - *Cleveland*  
 FACILITY CONTACT - *Robert Hukill*  
 ISS INSPECTION DATE - *4-29-81*

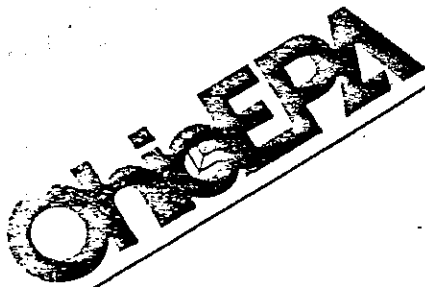
PHONE NO. - *(216) 232-9400*

	COLUMN I	COLUMN II	COLUMN III	COLUMN IV	COLUMN V	COLUMN VI
Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13		✓	
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14		✓	
	2	"	"			
	3	"	"	0		
	4	"	"			
	D 1	3745-55-15	265.15	B B B		} R.D.F. 8/14/81
4	2	"	"			
	3	"	"			
	4	"	"		✓	
	5	"	"		✓	
	6	"	"		✓	
	7	"	"		✓	
	8	"	"		✓	
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
5	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52	B	✓	R.D.F. 8/14/81

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use	
12	L	1	3745-57-31	265.251			
		2	3745-57-32	265.252			
		3		265.258			
		4	3745-57-36	265.256			
		5	"	"			
		6	3745-57-37	265.257			
		7	3745-57-37	265.257			
13	M	1	3745-57-52	265.272			
		2	"	"			
		3	3745-57-53	265.273			
		4	3745-57-56	265.276			
		5	3745-57-58	265.278			
		6	3745-57-58	265.278			
		7	3745-57-59	265.279			
		8	3745-57-61	265.281			
		9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302		
			2	"	"		
			3	"	"		
			4	"	"		
	B	1	3745-57-79	265.309			
			2	"	"		
	C	1	3745-56-03	265.112			
			2	"	"		
			3	"	"		
	D	1	3745-56-32	265.192			
			3745-57-82	265.312			
			3745-55-17	265.17(b)			
			3745-57-83	265.313			
15	E	1	3745-55-17	265.17(b)			
			3745-57-84	265.314			
	F	1	"	"			
			2	"	"		
	G	1	"	"			
			2	"	"		
	O&P	1	3745-57-85	265.315			
			3745-58-33	265.373			
16	I	B	1	"	"		
			2	"	"		
			3	"	"		
			4	"	"		
			5	"	"		
II	A	1a	3745-58-35	265.375			
		b	"	"			
		c	"	"			
17			2a	3745-58-35	265.375		
			b	"	"		
	B	1	"	"			
			2	"	"		
			3	"	"		
			4	"	"		
			5	"	"		

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.



Re: Hazardous Waste  
Cuyahoga County  
Hukill Chemical Company

RECEIVED

MAY 22 1981

WASTE MANAGEMENT BRANCH  
EPA, REGION V

Mr. Robert Hukill, General Manager  
Hukill Chemical Company  
7013 Krick Road  
Bedford, Ohio 44146

May 13, 1981

Dear Mr. Hukill:

The Ohio Environmental Protection Agency is cooperating with the U.S. EPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976, Public Law 94-580. In this effort, personnel of the Ohio EPA are conducting inspections of facilities, storage, treatment or disposal of hazardous waste materials.

This letter is to inform you that on April 29, 1981, an inspection of your facility was conducted by Melinda Merryfield-Becker from the Northeast District Office. You, Mr. James Hukill, Mr. Paul Pustay and Mr. Robert Lang represented Hukill Chemical. Your facility was found to be in compliance with most of the Interim Status Requirements. However, the following violations were noted:

Inspections should include records of malfunctions, operator error, and discharges as required by 40 CFR Part 265.15(a).

Emergency procedures in case a fire should be documented including an evacuation plan 40 CFR Part 265 Subpart D 265.52(a).

The information required by 40 CFR Part 265.73 should be kept in one single operating report. However, it was noted the required information was available through various departments of your company.

A copy of this letter and the inspection report will be sent to U.S. EPA, Region V, in Chicago. Any enforcement action related to this inspection will be initiated by U.S. EPA's Enforcement Division; in that case, U.S. EPA will, of course, contact you. If you have any questions, please contact me or Ms. Brenda Lillstrom at (312) 886-3899.

Sincerely,

Melinda Merryfield-Becker  
Solid Waste Scientist

MMB:psj

cc: Paula Cotter; Central Office

Enclosure - 2

## REMARKS

1. Hukill Chemical has their own lab equipped with a G.C. Samples are analyzed before acceptance. Also a sample is pulled from incoming shipments and checked by G.C.
2. The plant runs 24 hours a day for five days per week. They do not have a guard on the weekends. However, they do have a Honeywell Electronic Security System.
3. Fence on two sides, steep bank to S. K. Wellman Lake in the back, steep bank to stream borders the plant. There is no fence in the front.
4. The entity has an in-plant fire brigade and fire drills. However, the procedure to be followed in case of fire should be documented. The entity does have an SPCC plan.
5. Spill plan presently being revised.
6. This information is not kept in one operating report per se, but is available. The lab is notified of all wastes coming in and records the date and tank where the waste is stored.
7. Emergency equipment should be inspected once per month. Hukill is currently only inspecting emergency equipment once/year.

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSS <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
TO: Melinda Becker EPA	FROM: J. Sanger	DATE: 1/24/81	
SUBJECT: Hukill		TIME:	

## SUMMARY OF COMMUNICATION

I asked Melinda several questions:

1. Which treatment plant is Hukill thinking of tying into (Since both Walton Hills and Cuyahoga Cty. Engr. had told me they knew of no such plans.) She said she thought it was Walton Hills, but there was some question of whether they would accept Hukill's discharges. She said she would look into it.
2. Is there a concrete pad under the barrel storage area or not, since OEPA's letter says there is, and Watson's report says it's a dirt base. She said there is a pad, but not all the barrels are on it, i.e. they take up more space than the pad covers.
3. How many barrels are there, since I've seen ~~various~~ reports of 400-5000. She estimated 500-700.
4. Have they looked at possible groundwater problems at all. She did not know of anything having been done.
5. Who were past owners of the site. She did not know; said the building there is about 10 years old.
6. What exactly is in the barrels in the "scrap solvent area"; she said some of it is solvent that can be reprocessed and some of it cannot, i.e. Hukill plans to "dispose" of it.
7. Does Hukill buy the solvents from people to resell to others, or do people pay them to take it away. She said it is more like a service, she thinks, that Hukill processes their clients' own solvents and gives it back to them. The stuff that is unreclaimable she did not know whether the ~~company~~ clients paid Hukill to take it or not.
8. Will the next permit add the two now-unpermitted discharges, and additional parameters to cover the baddies we have found in samples. She said the two pipes would be added or else capped, or, she really hoped, they would tie into the sewer. She said they really couldn't put in requirements that would ~~necessitate~~ necessitate Hukill doing a "mass spec scan", as it's too expensive, so they would probably continue to use indicator parameters instead. Altho they probably would add some parameters, e.g. COD, and maybe a bioassay for toxic effects, depending on the state of the art of bioassay by then. She said monitoring frequency would be increased to once a week.
9. Do they plan to require dredging the sludge from the stream. She said that hadn't been brought up. How about scraping the stream bank? She said yes if it is sufficient-

## CONCLUSIONS, ACTION TAKEN OR REQUIRED

- iently contaminated; that the order contemplated this but couldn't say it because they didn't yet have the waste characterization study to know how bad it was.
10. Is the Waste study, due Dec. 15 by their Order, done yet. No-- maybe next week. She just talked to the consultant today.
  11. What does Robert Ross take. She said still bottoms only; Hukill's problem is find someone to take other stuff that Ross won't take.
  12. Has Hukill met Order #1 deadline for BMP plan. Yes, though she had to ask them add a few things, it's basically ok. Have they met Order #3, detailed plans? She said no, because they needed the analytical data from the Waste Char. before they could do detailed plans. (see 10 above)
  13. Are they considering fines. Assume so if they don't comply with the ord

## INFORMATION COPIES

TO: Acierio/Miner    Grimes/Schulteis    Penner    Bryson

OVER



(apparently this mea no fines if they do empty, even though they've had so many permit violations&(unpermitted discharges) She said they were more interested in getting the place cleaned up than fining them.

14. I asked about the discrepancies between thier sampling that showed up to 5330ppm TOC and Mukill's self monitring showing compliance with the permit at 90 ppm. She said she thought the discharge must be highly variable, but that it is kind of suspicious that their reports have showed them to be in the 1000 range a couple of times. She thinks its in their sampling technique (grab), and not an analytical failure (or, by implication falsification). I asked if it hadn't been pointed out to them that the permit requires composites, she said yes, I said what do they say, she said not much, or that they didn't know that or similar.

15. I asked if she hadn't told them she wanted a permanent cap on one of the unpermitted pipes, as her trip notes of last April show, (they have put a removable one on) and she said she had not said it before, but just recently wrote them to ask them to make it permanent.

16. I asked her to characterize the spillage situation as light, medium or bad and she said bad.

17. I asked her about the fire danger and hse said she wasn't qualified to make a judgement